

Citation and Notification of Penalty  
U.S. Department of LaborOccupational Safety and Health Administration  
2 East Blackwell Street  
Dover, NJ 07801

3. Issuance Date 12/15/89	4. Inspection Number 107663385
5. Reporting ID 0214200	6. CSHO ID D6209
7. Optional Report No. B1	8. Page No. 1 of 61

The violation(s) described in this Citation are alleged to have occurred on or about the day the inspection was made unless otherwise indicated within the description given below.

10. Inspection Date(s):

6/22/89 - 12/13/89

11. Inspection Site:

704 Doremus Avenue  
Newark, NJ 07105

9. To:

Central Steel Drum  
and its successors  
704 Doremus Avenue  
Newark, NJ 07105

Attn: Allen Fischer, President

THE LAW REQUIRES that a copy of this Citation be posted immediately in a prominent place at or near the location of the violation(s) cited below. The Citation must remain posted until the violations cited below have been abated, or for 3 working days (excluding weekends and Federal holidays), whichever is longer.

This Citation describes violations of the Occupational Safety and Health Act of 1970. The penalty(ies) listed below are based on these violations. You must abate the violations referred to in this Citation by the dates listed below and pay the penalties proposed, unless within 15 working days (excluding weekends and Federal holidays) from your receipt of this Citation and penalty you mail a notice of contest to the U.S. Department of Labor Area Office at the address shown above. (See the enclosed booklet which outlines your rights and responsibilities and should be read in conjunction with this form.) You are further notified that unless you inform the Area Director in writing that you intend to contest the Citation or proposed penalties within 15 working days after receipt, this Citation and the proposed penalties will become a final order of the Occupational Safety and Health Review Commission and may not be reviewed by any court or agency. Issuance of this Citation does not constitute a finding that a violation of the Act has occurred unless there is a failure to contest as provided for in the Act or, if contested, unless the Citation is affirmed by the Review Commission.

12. Item Number

13. Standard, Regulation or  
Section of the Act Violated

14. Description

15. Date by Which  
Violation Must  
Be Abated

16. Penalty

1  
20 CFR 1910.22(a)(2): Floor(s) of workroom(s) were not maintained, so far  
as possible, in a dry condition:

01/18/90

1000.00

a.

Hoop Replacement Area, Central Steel Drum:

Employees stand in 6 to 7 inches of water while operating dip tanks during  
reconditioning of rings.

Violation observed on or about 7/18/89.

17. Area Director

ROBERT D. FULICK

18. Last Pg

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Penalty  
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CitationMake Check or  
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Payable to:  
"DOL-OSHA"Indicate  
Inspection  
Number  
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**Citation and Notification of Penalty**  
 US Department of Labor  
 Occupational Safety and Health Administration  
 2 East Blackwell Street  
 Dover, NJ 07801

3. Issuance Date 2/15/89	4. Inspection Number 107663585
5. Reporting ID 0214200	6. CSHO ID D6209
7. Optional Report No. B1	8. Page No. 2 of 61

1. Type of Violation(s)	2. Citation Number
Serious	01

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12. Item Number	13. Standard, Regulation or Section of the Act Violated	14. Description	15. Date by Which Violation Must Be Abated	16. Penalty
2	29 CFR 1910.37(q)(1):	Exits or access to exits were not marked by readily visible signs.	01/03/90	600.00
Central Steel Drum Newark, New Jersey  A) Welding Department B) Head Department C) General Assembly Area  Exits were not marked by visible signs.  Violation observed on or about 10/25/89.				

17. Area Director  
 ROBERT D. KULICK

18. Last Pg

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CITATION AND NOTIFICATION OF PENALTY

AREA OFFICE COPY

OSHA-2 (Rev. 1/84)

Penalties Are Due Within 15 Days of Receipt of This Notification Unless Contested (See enclosed Booklet)

This Section May Be Detached Before Posting

Total Penalty for This Citation  
 Make Check or Money Order Payable to: "DOL-OSHA"  
 Indicate Inspection Number on Remittance



**U.S. Department of Labor**  
Occupational Safety and Health Administration



**Citation and Notification of Penalty**  
U.S. Department of Labor  
Occupational Safety and Health Administration  
2 East Blackwell Street  
Dover, NJ 07801

3. Issuance Date 12/15/89	4. Inspection Number 107663585
5. Reporting ID 0214200	6. CSHO ID D6209
7. Optional Report No. 81	8. Page No. 3 of 61

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12. Item Number	13. Standard, Regulation or Section of the Act Violated	14. Description	15. Date by Which Violation Must Be Abated	16. Penalty
3	29 CFR 1910.95(d)(1):	A representative monitoring program was not developed and implemented when information indicated that an employee's exposure may equal or exceed an 8-hour weighted average of 85 dBA:	01/03/90	900.00
a)	Reconditioning Plant, Central Steel Drum:	Conveyer, Punch Press, and Spray booth operators of Central Steel Drum were exposed to continuous noise at 316, 303, 301, 298, 280, 278, 277, 215, 173, 159.7 159.3 and 133.5% of the permissible daily noise (8 hours time weighted average sound level of 90 dBA) or an equivalent sound level of approximately 98.41, 98.10, 98.20, 98.02, 97.5, 97.3, 97.37, 95.52, 94.50, 94.0, 93.77 and 93.18 dBA during the 420 minute sampling period on 7/18/89; exposure calculations included a zero increment for the 60 minutes not sampled.		
ABATEMENT NOTE: A representative monitoring program must be developed and implemented when information indicates employee exposure equals or exceeds the 8 hour time-weighted average of 85 dBA.				
Violation observed on or about 7/18/89.				

17. Area Director ROBERT D. KULICK

Last Pg

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US Department of Labor

Occupational Safety and Health Administration

2 East Blackwell Street

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7. Optional Report No. B1	8. Page No. 4 of 61

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12. Item Number	13. Standard, Regulation or Section of the Act Violated	14. Description	15. Date by Which Violation Must Be Abated	16. Penalty
4	29 CFR 1910.95(g)(1):	An audiometric testing program was not established and maintained for all employees whose noise exposure equaled or exceeded an 8-hour time-weighted average of 85 dBA:	01/18/90	\$600.00
a)	Reconditioning Plant, Central Steel Drum:	Conveyer, Punch Press and Spray booth operators were exposed to continuous noise at 303, 283, 278, 215, 173, 159.3, and 159.1% of the permissible daily noise (8 hour time-weighted average sound level of 90 dBA) or an equivalent sound level of approximately 98.10, 97.3, 97.3, 95.52, 94.50, 94.0, and 93.3 dBA during a 420 minute sampling period on 7/18/89; exposure calculations included a zero increment for the 60 minutes not sampled. Employer failed to include all employees who were exposed to noise levels above 85 dBA for an 8 hour time-weighted average in an audiometric testing program.		

Violation observed on or about 7/18/89.

17. Area Director

ROBERT D. KULICK

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**U.S. Department of Labor**  
Occupational Safety and Health Administration



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12. Item Number	14. Description	15. Date by Which Violation Must Be Abated	16. Penalty
5	29 CFR 1910.95(g)(5)(i): Baseline audiograms were not established within 6 month of an employee's first exposure for each employee whose exposure to noise equaled or exceeded an 8-hour time-weighted average of 85 dBA:	01/18/90	900.00
a)	Reconditioning Plant, Central Steel Drum: Conveyor, Punch Press, and Spray operators of Central Steel Drum, were exposed to continuous noise at 303, 283, 278, 215, 173.0, 159.3, and 159.1 percent of the permissible daily noise (8 hour time-weighted average sound level of 90 dBA) or an equivalent sound level of approximately 98.1, 97.3, 97.3, 95.52, 94.0, 94.0, and 93.3 dBA during the 420 minute sampling period on 7/18/89; exposure calculations included a zero increment for the 60 minutes not sampled.		
	These employees have never received an audiometric test to determine a baseline, during his duration of being exposed to a noise equal to above the 8 hour time-weighted average of 85 dBA.		
	Violation observed on or about 7/18/89.		

17. Area Director  
ROBERT D. KULICK

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29 CFR 1910.95(g)(6): New audiograms were not obtained annually for each employee exposed to noise at or above an 8 hour time-weighted average of 85 dBA:

02/02/90

\$00.00

a)  
Reconditioning Plant, Central Steel Drum:

Conveyer, Punch press and Spray Booth operators of Central Steel Drum, were exposed to continuous noise at 301, 298, and 133.5% of the permissible daily noise (8 hour time-weighted average sound level of 90 dBA) or an equivalent sound level of approximately 98.20, 98.02 and 93.18 dBA during the 420 minute sampling period on 7/18/89; exposure calculations included a zero increment for the 60 minutes not sampled.

Violation observed on or about 8/29/89.

17. Area Director

ROBERT D. KULICK

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7				
29	CFR 1910.95(i)(2)(1):	The wearing of hearing protectors was not ensured for employees exposed to sound levels exceeding those listed in Table G-16 of 29 CFR 1910.95 as required by 29 CFR 1910.95(b)(1):	01/03/90	900.00
a)		Reconditioning Plant, Central Steel Drum: Conveyer, Punch Press, and Spray Booth operators of Central Steel Drum, were exposed to continuous noise at 316, 303, 301, 298, 280, 278, 277, 215, 173, 159.7 and 159.3% of the permissible daily noise (8 hour time-weighted average sound level of 90 dBA) or an equivalent sound level of approximately 98.41, 98.10, 98.20, 98.02, 97.5, 97.3, 97.37, 95.52, 94.50, 94.0 and 93.77 dBA during the 420 minute sampling period on 7/18/89; exposure calculations included a zero increment for the 60 minutes not sampled. These employees were not wearing any hearing protection on the date of the inspection.		
		Note: An effective hearing conservation program in accordance with 29 CFR 1910.95(c) through (n) shall be maintained.		

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Total  
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Citation  
Make Check or  
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Inspection  
Number  
on  
Remittance



Citation and Notification of Penalty  
US Department of Labor  
Occupational Safety and Health Administration  
2 East Blackwell Street  
Dover, NJ 07801

3. Date 12/13/89	4. Inspection Number 107663585
5. Reporting ID 0214200	6. CSHO ID D6209
7. Optional Report No. 81	8. Page No. 8 of 61

The violation(s) described in this Citation are alleged to have occurred on or about the day the inspection was made unless otherwise indicated within the description given below.

10. Inspection Date(s):

6/22/89 - 12/13/89

11. Inspection Site:

704 Doremus Avenue  
Newark, NJ 07105

1. Type of Violation(s)	2. Citation Number
Serious	01

9. To:

Central Steel Drum  
and its successors  
704 Doremus Avenue  
Newark, NJ 07105

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12. Item Number	14. Description	15. Date by Which Violation Must Be Abated	16. Penalty
13. Standard, Regulation or Section of the Act Violated	Employer must ensure that each employee will wear hearing protection while working in Central Steel Drum Plant.  Violation observed on or about 7/18/89.		

17. Area Director  
ROBERT D. KULICK

18. Last Pg

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US Department of Labor

Occupational Safety and Health Administration  
2 East Blackwell Street  
Dover, NJ 07801

3. Issuance Date 12/15/89	4. Inspection Number 107663585
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7. Optional Report No. B1	8. Page No. 9 of 61

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6/22/89 - 12/13/89

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Serious	01

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12. Item Number	13. Standard, Regulation or Section of the Act Violated	14. Description	15. Date by Which Violation Must Be Abated	16. Penalty
B	29 CFR 1910.95(k)(1):	A training program was not instituted for all employees who were exposed to noise at or above an 8 hour time-weighted average of 85 dBA:	01/18/90	900.00
a)	Reconditioning Plant, Central Steel Drum:	Conveyor, Punch Press, and Spray Booth operators of Central Steel Drum were exposed to continuous noise at 316, 303, 301, 298, 280, 278, 277, 215, 173, 159.7, 159.3, and 133.5% of the permissible daily noise (8 hour time-weighted average sound level of 90 dBA) or an equivalent sound level of approximately 98.41, 98.10, 98.20, 98.02, 97.05, 97.3, 97.37, 95.52, 94.50, 94.0, 93.77 and 93.18 dBA during the 420 minute sampling period on 7/18/89; exposure calculations included a zero increment for the 60 minutes not sampled. These employees were not trained in accordance with 1910.95(k)(1).		
ABATEMENT NOTE: The employer shall ensure that each employee is informed of the following:				

17. Area Director  
ROBERT D. KULICK

18. Last Pg

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 Occupational Safety and Health Administration  
 2 East Blackwell Street  
 Dover, NJ 07801

3. Issuance Date 12/15/89	4. Inspection Number 107663585
5. Reporting ID 0214200	6. CSHO ID D6209
7. Optional Report No. 81	8. Page No. 10 of 61

1. Type of Violation(s)	2. Citation Number
Serious	01

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6/22/89 - 12/13/89

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12. Item Number	14. Description	15. Date by Which Violation Must Be Abated	16. Penalty
13. Standard, Regulation or Section of the Act Violated	1. The effects of noise in hearing; 2. The purpose of hearing protectors, the advantages, disadvantages, and attenuation of various types, and instructions on selection fitting use and care; 3. The purpose of audiometric testing, and an explanation of the test procedures; 4. A complete explanation of the need for 14 hours of quiet prior to having an audiogram; 5. The employees right to a follow-up evaluation conducted by a Physician to investigate other causes for the hearing loss.		

Violation observed on or about 7/18/89.

17. Area Director

ROBERT D. KULICK

18. Last Pg

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OSHA-2 (Rev. 1/84)

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## Citation and Notification of Penalty

U.S. Department of Labor

Occupational Safety and Health Administration

2 East Blackwell Street

Dover, NJ 07801

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5. Reporting ID 0214200	6. CSHO ID D6209
7. Optional Report No. 81	8. Page No. 11 of 61

10. Inspection Date(s):

6/22/89 - 12/13/89

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12. Item Number	13. Standard, Regulation or Section of the Act Violated	14. Description	15. Date by Which Violation Must Be Abated	16. Penalty
29	29 CFR 1910.95(1)(1);	A copy of 29 CFR 1910.95 was not made available to affected employees or their representatives:	12/29/89	500.00
a)	Reconditioning Plant, Central Steel Drum:	Conveyor, Punch Press and Spray Booth operators of Central Steel Drum were exposed to continuous noise at 316, 303, 301, 298, 280, 278, 277, 215, 173, 159.7, 159.3, and 133.5% of the permissible daily noise (8 hour time-weighted average sound level of 90 dBA) or an equivalent sound level of approximately 98.41, 98.10, 98.20, 98.02, 97.05, 97.3, 97.37, 95.52, 94.50, 94.0, 93.77 and 93.18 dBA during the 420 minute sampling period on 7/18/89; exposure calculations included a zero increment for the 60 minutes not sampled.		
		Violation observed on or about 7/18/89.		

17. Area Director

ROBERT D. KULICK

Last Pg

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U.S. Department of Labor  
Occupational Safety and Health Administration  
2 East Blackwell Street  
Dover, NJ 07801

3. Date 12/15/89	4. Inspection Number 107663585
5. Reporting ID 0214200	6. CSHO ID D6209
7. Optional Report No. 81	8. Page No. 12 of 61

10. Inspection Date(s):

6/22/89 - 12/13/89

Type of Violation(s)	2 Citation Number
Serious	01

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12. Item Number	13. Standard, Regulation or Section of the Act Violated	14. Description	15. Date by Which Violation Must Be Abated	16. Penalty
10	29 CFR 1910.106(e)(6)(i): Adequate precautions against the ignition of flammable vapors were not taken:		01/03/90	400.00
a)	Inner Storage Area, Refabrication Plant, Central Steel Drums:			
	55 Gallon drums containing class IB flammable liquids are not properly grounded.			
Violation observed on or about 12/06/89.				

17. Area Director  
ROBERT D. MULICK

18. Last Pg

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Total Penalty for This Citation  
Make Check or Money Order Payable to: "DOL-OSHA"  
Indicate Inspection Number on Remittance



**Citation and Notification of Penalty**  
U.S. Department of Labor  
Occupational Safety and Health Administration  
2 East Blackwell Street  
Dover, NJ 07801

3. Issue Date 12/15/89	4. Inspection Number 107663585
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7. Optional Report No. B1	8. Page No. 13 of 61

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6/22/89 - 12/13/89

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12. Item Number	13. Standard, Regulation or Section of the Act Violated	14. Description	15. Date by Which Violation Must Be Abated	16. Penalty
11	29 CFR 1910.106(e)(6)(ii): Class 1 flammable liquid(s) were dispensed into containers without electrically interconnecting the nozzle and the containers;		01/03/90	400.00
a)	Inner Storage Area, Refabrication Plant, Central Steel Drum: 55 Gallon drums, containing class 1B flammable liquids, are not electrically interconnected from the nozzle to the 55 gallon drum.			

Violation observed on or about 12/06/89.

17. Area Director  
ROBERT D. KULICK

Last Pg

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**U.S. Department of Labor**  
Occupational Safety and Health Administration



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**6/22/89 - 12/13/89**

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12			
29 CFR 1910.107(b)(5)(i):	The average air velocity over the open face of the paint spray booth(s) was less than 100 linear feet per minute:	01/18/90	600.00
Reconditioning Plant Spray Booths:			
A) Drum Inner Lining Spray Booth, S. W. Corner of Plant			
B) Head Spray Booth, S. W. Corner of Plant			
C) Automatic Spray Booth			
Readings averaging 93.3, 62.7 and 75.5 fpm respectively were measured on 10/18/89.			
Violation observed on or about 10/18/89.			

17. Area Director

**ROBERT D. KULICK**

18. Last Pg

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12. Item Number	13. Standard, Regulation or Section of the Act Violated	14. Description	15. Date by Which Violation Must Be Abated	16. Penalty
13	29 CFR 1910.107(b)(5)(iv):	Space within the spray booths on the downstream and upstream sides of filters was not protected with approved automatic sprinklers:	01/18/90	700.00
Reconditioning Plant, Central Steel Drum:				
A) Interior Drum Lining, S. W. corner Reconditioning Plant.				
B) Interior Drum Lining, N. W. corner Reconditioning Plant.				
Automatic Sprinklers did not protect the upstream or downstream sides of the filter.				
Violation observed on or about 7/18/89.				

17. Area Director ROBERT D. KULICK

Last Pg

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AREA OFFICE COPY

CITATION AND NOTIFICATION OF PENALTY

OSHA-2 (Rev 1/84)

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**U.S. Department of Labor**  
Occupational Safety and Health Administration



**Citation and Notification of Penalty**  
US Department of Labor  
Occupational Safety and Health Administration  
2 East Blackwell Street  
Dover, NJ 07801

3. Issuance Date <b>12/15/89</b>	4. Inspection Number <b>107663585</b>
5. Reporting ID <b>0214200</b>	6. CSHO ID <b>D6209</b>
7. Optional Report No. <b>81</b>	8. Page No. <b>16 of 61</b>

The violation(s) described in this Citation are alleged to have occurred on or about the day the inspection was made unless otherwise indicated within the description given below.

10. Inspection Date(s):

**6/22/89 - 12/13/89**

11. Inspection Site:

**704 Doremus Avenue  
Newark, NJ 07105**

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1 Type of Violation(s)	2 Citation Number
Serious	01

9. To:

**Central Steel Drum  
and its successors  
704 Doremus Avenue  
Newark, NJ 07105**

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12. Item Number	14. Description	15. Date by Which Violation Must Be Abated	16. Penalty
14			
29 CFR 1910.107(b)(7):	Conveyors are used to carry work into or out of spray booths and the openings are not as small as practical.	01/18/90	600.00
a)			
Inner Lining Spray Booth, S. W. Corner of Plant			
Inner Lining Spray Booth, N. W. Corner of Plant			
Spray booth sides where conveyor carries drums into and out of spray booth are not as small as practical.			
Violation observed on or about 7/18/89.			

17. Area Director

**ROBERT D. KULICK**

18. Last Pg

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Occupational Safety and Health Administration



**Citation and Notification of Penalty**  
US Department of Labor  
Occupational Safety and Health Administration  
2 East Blackwell Street  
Dover, NJ 07801

3. Issuance Date 12/15/89	4. Inspection Number 107663585
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7. Optional Report No. 81	8. Page No. 17 of 61

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10. Inspection Date(s):

6/22/89 - 12/13/89

1. Type of Violation(s)	2. Citation Number
Serious	01

11. Inspection Site:

704 Doremus Avenue  
Newark, NJ 07105

9. To:

Central Steel Drum  
and its successors  
704 Doremus Avenue  
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12. Item Number	13. Standard, Regulation or Section of the Act Violated	14. Description	15. Date by Which Violation Must Be Abated	16. Penalty
15	29 CFR 1910.107(c)(5):	Electrical equipment not approved for locations containing both deposits of readily ignitable residues and explosive vapors was present in spraying areas:	01/03/90	700.00
a)	Reconditioning Plant:	A. Inner Lining Booth, S. W. corner of plant; B. Inner Lining Booth, N. W. corner of plant; Pedestal fan being used by employees could act as a source of ignition. It is covered with deposits of ignitable residues.		
		Violation observed on or about 7/18/89.		

17. Area Director **ROBERT D. KULICK**

18. Last Pg

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**U.S. Department of Labor**  
Occupational Safety and Health Administration



**Citation and Notification of Penalty**  
U.S. Department of Labor  
Occupational Safety and Health Administration  
2 East Blackwell Street  
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3. Issuance Date <b>12/15/89</b>	4. Inspection Number <b>107663585</b>
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**6/22/89 - 12/13/89**

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1. Type of Violation(s)	2. Citation Number
Serious	01

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12. Item Number	13. Standard, Regulation or Section of the Act Violated	14. Description	15. Date by Which Violation Must Be Abated	16. Penalty
16	29 CFR 1910.107(c)(6);	Electrical wiring and equipment outside of but within 20 feet of spraying area(s), and not separated therefrom by partitions, did not conform to the provisions for Class 1, Division 2, hazardous locations:	01/18/90	700.00
Reconditioning Plant, Central Steel Drum:				
Locations: A. Inner Lining Spray Booth, N. W. corner of plant;				
B. Inner Lining Spray Booth, S. W. corner of plant;				
Improper wiring (non-conduit) is being used in spray area of spray booth.				
Violation observed on or about 7/18/89.				

17. Area Director  
**ROBERT D. KULICK**

18. Last Pg

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7. Optional Report No. 81	8. Page No. 19 of 61

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12. Item Number	13. Standard, Regulation or Section of the Act Violated	14. Description	15. Date by Which Violation Must Be Abated	16. Penalty
17	29 CFR 1910.107(c)(8):	Portable lamp(s) were used in spraying area(s) during spraying operations:	01/18/90	700.00
a)		Interior Drum Lining, N. W. corner Reconditioning Plant: Portable lamp is being used in spraying area (3 foot within spray booth).		
		Violation observed on or about 7/18/89.		

17. Area Director  
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18. Last Pg

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Citation and Notification of Penalty  
US Department of Labor  
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3. Issuance Date 12/15/89	4. Inspection Number 107663585
5. Reporting ID 0214200	6. CSHO ID D6209
7. Optional Report No. 81	8. Page No. 20 of 61

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6/22/89 - 12/13/89

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Serious	01

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704 Doremus Avenue  
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12. Item Number	13. Standard, Regulation or Section of the Act Violated	14. Description	15. Date by Which Violation Must Be Abated	16. Penalty
19	29 CFR 1910.107(g)(2):	Spraying Area(s) were not kept free from the accumulation of deposits of combustible residues:	01/03/90	\$00.00
2)	Reconditioning Plant, Central Steel Drum:			
	A. Spray booth, exterior of drum lid;			
	B. N. W. corner of plant, inner lining spray booth;			
	C. Spray booth, interior of drum lid;			
	D. S. W. corner of plant, inner lining spray booth;			
	E. Exterior spray booth of 55 gallon drums:			
	Spraying area(s) were not kept free from the accumulation of deposits of combustible residues.			
	Violation observed on or about 7/18/89.			

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6/22/89 - 12/13/89

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12. Item Number	14. Description	15. Date by Which Violation Must Be Abated	16. Penalty
19 29 CFR 1910.107(g)(3):	Approved metal waste cans were not provided in spraying area(s) for rags or waste impregnated with finishing material:	01/29/90	600.00
a)	Reconditioning Plants:		
	Rags containing paint and drum lining residues were not stored in approved metal waste cans.		
	Violation observed on or about 7/18/89.		

17. Area Director  
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18. Last Pg

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## Citation and Notification of Penalty

U.S. Department of Labor

Occupational Safety and Health Administration

2 East Blackwell Street

Dover, NJ 07801

3. Issuance Date 12/15/89	4. Inspection Number 107663585
5. Reporting ID 0214200	6. CSHO ID D6209
7. Optional Report No. B1	8. Page No. 22 of 61

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12. Item Number	13. Standard, Regulation or Section of the Act Violated	14. Description	15. Date by Which Violation Must Be Abated	16. Penalty
20			01/18/90	\$00.00
29	29 CFR 1910.134(a)(2):	The employer did not establish and maintain a respiratory protection program which included the requirements outlined in 29 CFR 1910.134(b):		
a)		Top Deck Areas and Abrasive Shot Areas: Employees working in top deck and Abrasive Shot Area were not using approved respirators for lead fume over exposure. See employer description in Item #37 of Citation 1.		
		Violation observed on or about 7/18/89.		

17. Area Director

ROBERT D. KULICK

18. Last Pg

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Total  
Penalty  
for This  
Citation

Make Check  
Money Ord  
Payable to  
"DOL-OSH"

Indicate  
Inspector  
Number  
on  
Remittance

END NOTIFICATION OF PENALTY

AREA OFFICE COPY

OSHA-2 (Rev. 1/84)

Penalties  
Are Due  
Within 15  
Days of  
Receipt  
of This  
Notification  
Unless  
Contested  
(See  
enclosed  
Booklet)

This Section  
May Be  
Detached  
Before  
Posting

Citation and Notification of Penal  
U.S. Department of LaborOccupational Safety and Health Administration  
2 East Blackwell Street  
Dover, NJ 07801

3. Issue Date 12/15/89	4. Inspection Number 107663585
5. Reporting ID 0214200	6. CSHO ID D6209
7. Optional Report No. B1	8. Page No. 23 of 61

The violation(s) described in this Citation are alleged to have occurred on or about the day the inspection was made unless otherwise indicated within the description given below.

10. Inspection Date(s):

6/22/89 - 12/13/89

11. Inspection Site:

704 Doremus Avenue  
Newark, NJ 07105

1. Type of Violation(s)	2. Citation Number
Serious	01

9. To:

Central Steel Drum  
and its successors  
704 Doremus Avenue  
Newark, NJ 07105

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12. Item Number	13. Standard, Regulation or Section of the Act Violated	14. Description	15. Date by Which Violation Must Be Abated	16. Penalty
21	29 CFR 1910.134(c);	Proper selection of respirators was not made according to the guidance of American National Standard Practices For Respiratory Protection Z88.2-1969;	12/24/89	700.00
a)	Top Deck Area of Central Steel Drum;	Employees exposed to an overexposure of lead fumes were wearing dust respirators (TC-21C-132). See employee exposure information in Item #37 of Citation #1.		
	Violation observed on or about 7/18/89			

17. Area Director  
ROBERT D. KULICK

18. Last Pg

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CitationMake Check or  
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Payable to:  
"DOL-OSHA"Indicate  
Inspection  
Number  
on  
Remittance



**Citation and Notification of Penalty**  
US Department of Labor  
Occupational Safety and Health Administration  
2 East Blackwell Street  
Dover, NJ 07801

3. Issuance Date <b>12/15/89</b>	4. Inspection Number <b>107663585</b>
5. Reporting ID <b>0214200</b>	6. CSHO ID <b>D6209</b>
7. Optional Report No. <b>81</b>	8. Page No. <b>24 of 61</b>

The violation(s) described in this Citation are alleged to have occurred on or about the day the inspection was made unless otherwise indicated within the description given below.

1. Type of Violation(s) <b>Serious</b>	2. Citation Number <b>01</b>
---	---------------------------------

10. Inspection Date(s):

**6/22/89 - 12/13/89**

11. Inspection Site:

**704 Doremus Avenue  
Newark, NJ 07105**

9. To:

**Central Steel Drum  
and its successors  
704 Doremus Avenue  
Newark, NJ 07105**

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12. Item Number	14. Description	15. Date by Which Violation Must Be Abated	16. Penalty
22 29 CFR 1910.134(e)(5):	Training did not provide the individuals with the opportunity to handle the respirator, have it fitted properly, test its face-piece-to face seal, wear it in normal air for a long familiarity period, and finally wear it in a test atmosphere:	01/18/90	\$00.00
a)	Top Deck Area of Central Steel Drums:		
	Employees exposed to lead fumes were required to wear respirators without proper training as stated above. See employee exposure information in Item #37 of Citation #1.		
	Violation observed on or about 07/18/89.		

17. Area Director

**ROBERT D. KULICK**

18. Last Pg

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**AREA OFFICE COPY**

**CITATION AND NOTIFICATION OF PENALTY**

OSHA-2 (Rev 1/84)

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**U.S. Department of Labor**  
Occupational Safety and Health Administration



**Citation and Notification of Penalty**  
U.S. Department of Labor  
Occupational Safety and Health Administration  
2 East Blackwell Street  
Dover, NJ 07801

3. Issuance Date 12/13/89	4. Inspection Number 107663585
5. Reporting ID 0214200	6. CSHO ID D6209
7. Optional Report No. 81	8. Page No. 25 of 61

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10. Inspection Date(s):

6/22/89 - 12/13/89

1. Type of Violation(s)	2. Citation Number
Serious	01

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704 Doremus Avenue  
Newark, NJ 07105

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12. Item Number	13. Standard, Regulation or Section of the Act Violated	14. Description	15. Date by Which Violation Must Be Abated	16. Penalty
23	29 CFR 1910.215(a)(2):	Abrasive wheels used on grinding machinery were not provided with safety guards which covered the spindle end, nut, flange projections:	01/18/90	500.00
a)	Plant Maintenance Department, Four Foot Pedestal Grinders:	Employees in maintenance shop working with improperly guarded and maintained pedestal grinder.		
Violation observed on or about 10/18/89.				

17. Area Director  
ROBERT D. KULICK

East Fg

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AREA OFFICE COPY

CITATION AND NOTIFICATION OF PENALTY

OSHA 2 (Rev. 1/84)

Penalties Are Due Within 15 Days of Receipt of This Notification Unless Contested (See enclosed Booklet)

This Section May Be Detached Before Posting

Total Penalty for This Citation  
Make Check or Money Order Payable to: "DOL-OSHA"  
Indicate Inspection Number on Remittance



Citation and Notification of Penalty  
U.S. Department of Labor  
Occupational Safety and Health Administration  
2 East Blackwell Street  
Dover, NJ 07801

3. Issuance Date 12/13/89	4. Inspection Number 107663585
5. Reporting ID 0214200	6. CSHO ID D6209
7. Optional Report No. 81	8. Page No. 26 of 61

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10. Inspection Date(s):

6/22/89 - 12/13/89

Type of Violation(s)	2. Citation Number
Serious	01

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704 Doremus Avenue  
Newark, NJ 07105

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704 Doremus Avenue  
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12. Item Number	14. Description	15. Date by Which Violation Must Be Abated	16. Penalty
24 29 CFR 1910.215(a)(4):	Work rest(s) on grinding machinery were not adjusted closely to the wheel with maximum opening of one-eighth inch:	01/03/90	500.00
a)	Plant Maintenance Department, Pedestal Grinders: Employees in maintenance shop working with pedestal grinder could not adjust work rests to the proper maximum opening of one-eighth inch due to use of improper work rests.		
Violation observed on or about 10/18/89.			

17. Area Director  
ROBERT D. KULICK

18. Last Pg

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OSHA-2 (Rev. 1/84)

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**U.S. Department of Labor**  
Occupational Safety and Health Administration

**Citation and Notification of Penalty**  
US Department of Labor  
Occupational Safety and Health Administration  
2 East Blackwell Street  
Dover, NJ 07801

3. Issuance Date 12/13/89	4. Inspection Number 107663585
5. Reporting ID 0214200	6. CSHO ID D6209
7. Optional Report No. B1	8. Page No. 27 of 61

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6/22/89 - 12/13/89

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12. Item Number	14. Description	15. Date by Which Violation Must Be Abated	16. Penalty
23	29 CFR 1910.215(b)(9): Guard for abrasive wheel machine where the operator stands in front of the machine was not constructed so that the peripheral protecting member could be adjusted to the constantly decreasing diameter of the wheel:	01/18/90	500.00
a)	Plant Maintenance Department, Pedestal Grinders: Employees in maintenance shop are working with improperly guarded and maintained pedestal grinder.		
Violation observed on or about 10/18/89.			

17. Area Director  
ROBERT D. KULICK

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**U.S. Department of Labor**  
Occupational Safety and Health Administration



**Citation and Notification of Penalty**  
U.S. Department of Labor  
Occupational Safety and Health Administration  
2 East Blackwell Street  
Dover, NJ 07801

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1. Type of Violation(s)	2. Citation Number
Serious	01

9. To:

Central Steel Drum  
and its successors  
704 Doremus Avenue  
Newark, NJ 07105

11. Inspection Site:

704 Doremus Avenue  
Newark, NJ 07105

3. Issuance Date 12/15/89	4. Inspection Number 107663585
5. Reporting ID 0214200	6. CSHO ID D6209
7. Optional Report No. 81	8. Page No. 28 of 61

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6/22/89 - 12/13/89

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12. Item Number

13. Standard, Regulation or  
Section of the Act Violated

14. Description

15. Date by Which  
Violation Must  
Be Abated

16. Penalty

26

29 CFR 1910.252(a)(2)(ii)(d): Valve protection caps were not in place, hand-tight, on compressed gas cylinders not in use or connected for use:

a)

Designated Welding Area of Refabrication Plant of Central Steel Drum:  
Two Argon and Carbon Dioxide 57 inch cylinders stored without valve protection cap in place.

Violation observed on or about 10/18/89.

12/24/89

600.00

17. Area Director

ROBERT D. KULICK

18. Last Pg

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CITATION AND NOTIFICATION OF PENALTY

AREA OFFICE COPY

OSHA-2 (Rev 1/84)



Citation and Notification of Penalty  
U.S. Department of Labor  
Occupational Safety and Health Administration  
2 East Blackwell Street  
Dover, NJ 07801

3. Issuance Date 12/15/89	4. Inspection Number 107663585
5. Reporting ID 0214200	6. CSHO ID D6209
7. Optional Report No. 81	8. Page No. 29 of 61

1. Type of Violation(s) Serious	2. Citation Number 01
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6/22/89 - 12/13/89

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12. Item Number	13. Standard, Regulation or Section of the Act Violated	14. Description	15. Date by Which Violation Must Be Abated	16. Penalty
27				
29	CFR 1910.252(f)(1)(iii)	Screens were not arranged so as to prevent any serious restriction of ventilation when welding was performed in a space entirely screened on all sides:		
a)				
		Welding Area of Reconditioning Plant: Employees are exposed to rays from arc welding performed in welding area.		
		Violation observed on or about 11/30/89.		
			01/02/90	600.00

17. Area Director  
ROBERT D. KULICK

18. Last Pg

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AREA OFFICE COPY

CITATION AND NOTIFICATION OF PENALTY

OSHA-2 (Rev. 1/84)

Penalties Are Due Within 15 Days of Receipt of This Notification Unless Contested (See enclosed Booklet)

This Section May Be Detached Before Posting

Total Penalty for This Citation

Make Check or Money Order Payable to: "DOL-OSHA"

Indicate Inspection Number on Remittance

**U.S. Department of Labor**  
Occupational Safety and Health Administration



**Citation and Notification of Penalty**  
US Department of Labor  
Occupational Safety and Health Administration  
2 East Blackwell Street  
Dover, NJ 07801

The violation(s) described in this Citation are alleged to have occurred on or about the day the inspection was made unless otherwise indicated within the description given below.

3. Issuance Date 12/15/89	4. Inspection Number 107663585
5. Reporting ID 0214200	6. CSHO ID D6209
7. Optional Report No. B1	8. Page No. 30 of 61

10. Inspection Date(s):

6/22/89 - 12/13/89

11. Inspection Site:

704 Doremus Avenue  
Newark, NJ 07105

1. Type of Violation(s)	2. Citation Number
Serious	01

9. To:

Central Steel Drum  
and its successors  
704 Doremus Avenue  
Newark, NJ 07105

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12. Item Number	13. Standard, Regulation or Section of the Act Violated	14. Description	15. Date by Which Violation Must Be Abated	16. Penalty
28			01/03/90	500.00
29	CFR 1910.303(d)(1)(ii):	Each disconnecting means for motors and appliances were not legibly marked to indicate its purpose:		
a)		Ring Department of Central Steel Drum: Circuit breakers which disconnect motor for sand blaster in ring department was not properly marked.		
b)		Motor and other equipment disconnects throughout the entire plant.		
		Violation observed on or about 10/25/89.		

17. Area Director  
ROBERT D. KULICK

18. Last Pg

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U.S. Department of Labor  
Occupational Safety and Health Administration



Citation and Notification of Penalty  
U.S. Department of Labor  
Occupational Safety and Health Administration  
2 East Blackwell Street  
Dover, NJ 07801

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3. Issuance Date 12/13/89	4. Inspection Number 107663585
5. Reporting ID 0214200	6. CSHO ID D6209
7. Optional Report No. B1	8. Page No. 31 of 61

10. Inspection Date(s):

6/22/89 - 12/13/89

11. Inspection Site:

704 Doremus Avenue  
Newark, NJ 07105

1. Type of Violation(s)	2. Citation Number
Serious	01

9. To:

Central Steel Drum  
and its successors  
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12. Item Number	13. Standard, Regulation or Section of the Act Violated	14. Description	15. Date by Which Violation Must Be Abated	16. Penalty
29	29 CFR 1910.305(b)(1):	Openings through which conductors enter boxes, cabinets, or fittings were not effectively closed:	01/03/90	700.00
29	29	Throughout the Plant: Electrical outlets throughout the plant were not properly sealed to avoid damage to conductors entering box.		
		Violation observed on or about 7/18/89.		

17. Area Director  
ROBERT D. FULICK

18. Last Pg

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OSHA-2 (Rev. 1/84)

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Citation and Notification of Penalty  
US Department of Labor  
Occupational Safety and Health Administration  
2 East Blackwell Street  
Dover, NJ 07801

3. Issuance Date 12/15/89	4. Inspection Number 107663585
5. Reporting ID 0214200	6. CSHO ID D6209
7. Optional Report No. B1	8. Page No. 32 of 61

The violation(s) described in this Citation are alleged to have occurred on or about the day the inspection was made unless otherwise indicated within the description given below.

10. Inspection Date(s):

6/22/89 - 12/13/89

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1. Type of Violation(s)	2. Citation Number
Serious	01

11. Inspection Site:

704 Doremus Avenue  
Newark, NJ 07105

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12. Item Number	13. Standard, Regulation or Section of the Act Violated	14. Description	15. Date by Which Violation Must Be Abated	16. Penalty
30	29 CFR 1910.305(b)(2):	Pull boxes, junction boxes, and fittings were not provided with covers approved for the purpose:  A) Main Power Panel  B) Top deck of refabrication plant, provide power to lining spray booths and lights of top deck area;  C) Junction box above Dip tank in Ring area;  D) Circuit breaker box in Ring area, adjacent to abrasive ring blaster cover boxes, junction boxes being used are not provided with covers;  E) Breaker Box located in general assembly area powering electrical equipment such as icebox and lights;  F) Circuit breaker box located in inner lining spray booth area powering portable lights and portable fan.	01/03/90	700.00

17. Area Director  
ROBERT D. KULICK

18. Last Pg

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Citation and Notification of Penalty  
U.S. Department of Labor  
Occupational Safety and Health Administration  
2 East Blackwell Street  
Dover, NJ 07801

1. Issuance Date 12/15/89	4. Inspection Number 107663583
5. Reporting ID 0214200	6. CSHO ID D6209
7. Optional Report No. B1	8. Page No. 33 of 61

1. Type of Violation(s) Serious	2. Citation Number 01
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The violation(s) described in this Citation are alleged to have occurred on or about the day the inspection was made unless otherwise indicated within the description given below.

10. Inspection Date(s):  
6/22/89 - 12/13/89

11. Inspection Site:  
704 Doremus Avenue  
Newark, NJ 07105

9. To:  
Central Steel Drum  
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704 Doremus Avenue  
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12. Item Number	13. Standard, Regulation or Section of the Act Violated	14. Description	15. Date by Which Violation Must Be Abated	16. Penalty
31a		The alleged violations below have been grouped because they involve similar or related hazards that may increase the potential for injury resulting from an accident.	02/02/90 3/18/90	900.00
	29 CFR 1910.1025(c)(1);	Employee(s) were exposed to lead at concentrations greater than fifty micrograms per cubic meter of air averaged over an eight-hour period:		
a)		Reconditioning Plant, Central Steel Drum, Drum Exit Area (Incinerator) and Steel Shot Area: Employee sampled on 10/18/89, while removing 55 gallon drums from conveyor belt of the rear incinerator was exposed to lead in excess of the permissible exposure limit of 50.0 ug/m3 (61.1 ug/m3 based on 8 hour work shift).		
		Violation observed on or about 7/18/89.		

17. Area Director  
ROBERT D. KULICK

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**U.S. Department of Labor**  
Occupational Safety and Health Administration



**Citation and Notification of Penalty**  
US Department of Labor  
Occupational Safety and Health Administration  
2 East Blackwell Street  
Dover, NJ 07801

3. Issuance Date 12/15/89	4. Inspection Number 107663585
5. Reporting ID 0214200	6. CSHO ID D6209
7. Optional Report No. 81	8. Page No. 34 of 61

The violation(s) described in this Citation are alleged to have occurred on or about the day the inspection was made unless otherwise indicated within the description given below.

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6/22/89 - 12/13/89

1. Type of Violation(s)	2. Citation Number
Serious	01

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12. Item Number	13. Standard, Regulation or Section of the Act Violated	14. Description	15. Date by Which Violation Must Be Abated	16. Penalty
31b	29 CFR 1910.1025(c)(2):	Employee(s) were exposed to lead for more than eight (8) hours during the work day in excess of the reduced permissible exposure limit:	02/02/90	
a)	Reconditioning Plant Central Steel Drum, Drum Exit Area (Incinerator) and Steel Shot Area:	Employees sampled on 7/18/89 while removing 55 gallon drums from conveyor belt at the rear of the incinerator were exposed to lead in excess of the modified permissible exposure limit of 44.4 ug/m3 based upon a 9 hour work shift.		
	The airborne lead level found in breathing zone was 56.6 ug/m3. The employee was sampled for 470 minutes with zero exposure assumed for the unsampled time.			
	Violation observed on or about 7/18/89.			

17. Area Director  
ROBERT D. KULICK

18. Last Pg

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2 East Blackwell Street  
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32	29 CFR 1910.1025(e)(1):	Engineering and work practice controls (including administrative controls) were not implemented to reduce and maintain employee exposure to lead in accordance with the schedule in Table I of this paragraph:	03/18/90	\$800.00
a)		Reconditioning Plant, Central Steel Drum, Drum Exit Area (Incinerator): Employees sampled on 7/18/89 while removing 55 gallon drums from conveyor belt at the rear of the incinerator were exposed to lead in excess of the modified permissible exposure limits of 44.4 ug/m3 based upon a 9 hour work shift (56.3 ug/m3 for a 9 hour work shift).		
b)		Employee sampled on 10/18/89, while removing 55 gallon drums from conveyor belt of the rear incinerator was exposed to lead in excess of the permissible exposure limit of 50 ug/m3 (61.1 ug/m3 based on 8 hour shift).		

17. Area Director ROBERT D. KULICK

18. Last Pg

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10. Inspection Date(s):

6/22/89 - 12/13/89

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12. Item Number	14. Description	15. Date by Which Violation Must Be Abated	16. Penalty
13. Standard, Regulation or Section of the Act Violated	<p>The airborne lead level found in breathing zones were 56.6 and 61.1 respectively. The employees were sampled for 470 and 409 minutes respectively with zero exposure calculated for remainder of work shift.</p> <p>Violation observed on or about 7/18/89.</p> <p>Abatement normally will be multi-step as follows:</p> <p>Step 1: Effective Respiratory Protection shall be provided and used by exposed employees as an interim protective measure until feasible engineering and/or administrative controls can be implemented or whenever such controls fail to reduce employee exposure to within permissible exposure limits. By 12/24/89.</p> <p>Step 2: Submit to the Area Director a written, detailed plan of abatement outlining a schedule for the implementation of engineering and/or administrative measures to control employee exposure to hazardous substances as referenced in this citation. This plan shall include, at a minimum, target</p>		

17. Area Director  
ROBERT D. KULICK

18. Last Pg

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Citation  
  
Make Check or  
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"DOL-OSHA"  
  
Indicate  
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Remittance



Citation and Notification of Penalty  
US Department of Labor

Occupational Safety and Health Administration  
2 East Blackwell Street  
Dover, NJ 07801

3. Issuance Date 12/15/89	4. Inspection Number 107663585
5. Reporting ID 0214200	6. CSHO ID D6209
7. Optional Report No. 81	8. Page No. 37 of 61

The violation(s) described in this Citation are alleged to have occurred on or about the day the inspection was made unless otherwise indicated within the description given below.

10. Inspection Date(s):

6/22/89 - 12/13/89

1. Type of Violation(s) Serious	2. Citation Number 01
------------------------------------	--------------------------

11. Inspection Site:

704 Doremus Avenue  
Newark, NJ 07105

9. To:

Central Steel Drum  
and its successors  
704 Doremus Avenue  
Newark, NJ 07105

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12. Item Number	14. Description	15. Date by Which Violation Must Be Abated	16. Penalty
13. Standard, Regulation or Section of the Act Violated	<p>dates for the following actions which must be consistent with the abatement dates required by this citation:</p> <ul style="list-style-type: none"><li>(1). Evaluation of Engineering/Administrative Control options.</li><li>(2). Selection of optimum control methods and completion of design.</li><li>(3). Procurement, installation, and operation of selected control measures.</li><li>(4). Testing and acceptance or modification/redesign of controls.</li></ul> <p>All proposed control measures shall be approved for each particular use by a competent industrial hygienist or other technically qualified person. Thirty (30) day progress reports are required during the abatement period. The thirty (30) day requirement for the submission of progress reports</p>		

17. Area Director  
ROBERT D. KULICK

East Pg

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AREA OFFICE COPY

CITATION AND NOTIFICATION OF PENALTY

OSHA-2 (Rev. 1/84)

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**U.S. Department of Labor**  
Occupational Safety and Health Administration



**Citation and Notification of Penalty**  
US Department of Labor  
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Serious	01

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5. Reporting ID 0214200	6. CSHO ID D6209
7. Optional Report No. 81	8. Page No. 38 of 61

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6/22/89 - 12/13/89

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13. Standard, Regulation or Section of the Act Violated	may be shortened or lengthened by the Area Director depending on the specific circumstances. By 1/18/90.  Step 3: Abatement shall have been completed by implementation of feasible engineering and/or administrative controls upon verification of their effectiveness in achieving compliance. By 3/18/90.		

17. Area Director

ROBERT D. KULICK

18. Last Pg

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**U.S. Department of Labor**  
Occupational Safety and Health Administration

**Citation and Notification of Penalty**  
U.S. Department of Labor  
Occupational Safety and Health Administration  
2 East Blackwell Street  
Dover, NJ 07801

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5. Reporting ID <b>0214200</b>	6. CSHO ID <b>D6209</b>
7. Optional Report No. <b>81</b>	8. Page No. <b>39 of 61</b>

10. Inspection Date(s):

**6/22/89 - 12/13/89**

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Newark, NJ 07105**

1. Type of Violation(s)	2. Citation Number
Serious	01

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12. Item Number	14. Description	15. Date by Which Violation Must Be Abated	16. Penalty
33	29 CFR 1910.1025(e)(3)(i): A written compliance program was not established and/or implemented to reduce lead exposures to or below the permissible exposure limit, and interim levels were applicable, solely by means of engineering and work practice controls in accordance with the implementation schedule in paragraph (e)(1):  a) Reconditioning Plant; Central Steel Drum, Drum Exit Area: Employee sampled on 10/18/89 while removing 55 gallon drums from conveyor belt at the rear of incinerator was exposed to lead in excess of the permissible exposure limit of 50 ug/m3 (61.1 ug/m3 based on 8 hour shift).  b) On 7/18/89, employee removing 55 gallon drums from conveyor belt existing rear of incinerator was exposed to lead fumes exceeding the modified, reduced, permissible exposure limit of 44.4 ug/m3. (Air sampling results indicated reading of 56.3 ug/m3 for a 9 hour shift).	02/02/90	900.00

17. Area Director **ROBERT D. KULICK**

18. Last Pg

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OSHA-2 (Rev. 1/84)

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**U.S. Department of Labor**  
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**Dover, NJ 07801**

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**6/22/89 - 12/13/89**

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1. Type of Violation(s)	2. Citation Number
<b>Serious</b>	<b>01</b>

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**Newark, NJ 07105**

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		<p>The airborne lead level found in breathing zones were 56.6 and 61.1 ug/m3 respectively. The employees were sampled for 470 and 409 minutes respectively with zero exposure calculated for remainder of work shift.</p> <p>Abatement Note: Written compliance program shall include the following:</p> <p>A) A description of each operation in which lead is emitted: eg., machinery used, material processed, controls in place, crew size, employee job responsibilities, operating procedures and maintenance practices.</p> <p>B) A description of the specific means that will be employed to achieve compliance, including engineering plans and studies used to determine methods selected for controlling exposure to lead.</p> <p>C) A report of technology considered in meeting the permissible exposure limit.</p>		

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**U.S. Department of Labor**  
Occupational Safety and Health Administration



**Citation and Notification of Penalty**  
U.S. Department of Labor  
Occupational Safety and Health Administration  
2 East Blackwell Street  
Dover, NJ 07801

3. Issuance Date <b>12/15/89</b>	4. Inspection Number <b>107663585</b>
5. Reporting ID <b>0214200</b>	6. CSHO ID <b>D6209</b>
7. Optional Report No. <b>81</b>	8. Page No. <b>41 of 61</b>

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12. Item Number	14. Description	15. Date by Which Violation Must Be Abated	16. Penalty
13. Standard, Regulation or Section of the Act Violated			
	D) Air monitoring data which documents the source of lead emissions.		
	E) A detailed schedule for implementation of the program, including documentation of the program, including documentation such as copies of purchase orders for equipment, construction contracts.		
	F) A work practice program which includes items required under paragraphs (g), (h), and (i) of 1910.1025.		
	G) An administrative control schedule.		
	H) Written programs shall be submitted upon request to the Assistant Secretary and the Director, and shall be available at the worksite for examination and copying by the Assistant Secretary, Director, any affected employee or authorized employee representatives.		

17. Area Director

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7. Optional Report No. B1	8. Page No. 42 of 61

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14. Description

15. Date by Which  
Violation Must  
Be Abated

16. Penalty

1) Written programs shall be revised and updated at least every six (6) months to reflect the current status of the program.

01/18/90

900.00

34

29 CFR 1910.1025(d)(7): Additional exposure monitoring was not conducted when there was a change in production, process, control or personnel, or any other reason to suspect a change that may have resulted in new or additional exposure to lead:

a)

Locations: Reconditioning Plant; Central Steel Drum, Drum Exit Area, (Incinerator) and the Steel Shot Area;  
Company did not perform additional monitoring when there was a change of personnel in the specified areas, (Drum Exit and Steel Shot Area).

17. Area Director

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12. Item Number	13. Standard, Regulation or Section of the Act Violated	14. Description	15. Date by Which Violation Must Be Abated	16. Penalty
35	29 CFR 1910.1025(h)(1):	All surfaces were not maintained as free as practicable of accumulations of lead:	01/18/90	900.00
a)		Lunch Room/Change Room of Central Steel Drum: Wipe sample indicated an accumulation of lead dust on the bench in the lunch/change room area. (Results indicated concentration of 18.312 micrograms.)		
ABATEMENT NOTE: Employer must remove dust from areas such as lunch room, (benches and tables), toilet facilities and water fountains by means of vacuuming or wet sweeping.				

17. Area Director  
ROBERT D. KULICK

Last Pg

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AREA OFFICE COPY

CITATION AND NOTIFICATION OF PENALTY

Penalties Are Due Within 15 Days of Receipt of This Notification Unless Contested (See enclosed Booklet)

This Section May Be Detached Before Posting

Total Penalty for This Citation  
Make Check or Money Order Payable to: "DOL-OSHA"  
Indicate Inspection Number on Remittance



**Citation and Notification of Penalty**  
U.S. Department of Labor  
Occupational Safety and Health Administration  
2 East Blackwell Street  
Dover, NJ 07801

3. Issuance Date <b>12/15/89</b>	4. Inspection Number <b>107663585</b>
5. Reporting ID <b>0214200</b>	6. CSHO ID <b>D6209</b>
7. Optional Report No. <b>81</b>	8. Page No. <b>44 of 61</b>

The violation(s) described in this Citation are alleged to have occurred on or about the day the inspection was made unless otherwise indicated within the description given below.

10. Inspection Date(s):

**6/22/89 - 12/13/89**

11. Inspection Site:

**704 Doremus Avenue  
Newark, NJ 07105**

1. Type of Violation(s)	2. Citation Number
<b>Serious</b>	<b>01</b>

9. To:

**Central Steel Drum  
and its successors  
704 Doremus Avenue  
Newark, NJ 07105**

Penalties  
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12. Item Number	14. Description	15. Date by Which Violation Must Be Abated	16. Penalty
26			
29	29 CFR 1910.1025(i)(1): The employer did not assure that food or beverage was not present, or consumed; tobacco products were not present, or used and cosmetics were not applied in areas where employees were exposed to lead in excess of the permissible exposure limit (PEL), without regard to the use of respirators:	01/18/90	900.00
a)	Reconditioning Plant, Drum Exit Area, Central Steel Drum: On 7/18/89, employee removing 55 gallon drum from conveyor belt exiting rear of incinerator was exposed to lead fumes exceeding the reduced modified permissible exposure limit of 44.4 ug/m3 (56.3 ug/m3 determined for a 9 hour shift).		
b)	Employee sampled on 10/18/89, while removing 55 gallon drums from conveyor belt at the rear of incinerator was exposed to lead in excess of the permissible exposure limit of 50.0 ug/m3 (based on 8 hour work shift).		

17. Area Director  
**ROBERT D. KULICK**

18. Last Pg

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**AREA OFFICE COPY**

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"DOL-OSHA"  
Indicate  
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on  
Remittance



**Citation and Notification of Penalty**  
U.S. Department of Labor

Occupational Safety and Health Administration  
2 East Blackwell Street  
Dover, NJ 07801

3. Issuance Date 12/13/89	4. Inspection Number 107663585
5. Reporting ID 0214200	6. CSHO ID D6209
7. Optional Report No. 81	8. Page No. 45 of 61

1. Type of Violation(s) Series	2. Citation Number 01
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The violation(s) described in this Citation are alleged to have occurred on or about the day the inspection was made unless otherwise indicated within the description given below.

10. Inspection Date(s):

6/22/89 - 12/13/89

11. Inspection Site:

704 Doremus Avenue  
Newark, NJ 07105

9. To:

Central Steel Drum  
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12. Item Number	14. Description	15. Date by Which Violation Must Be Abated	16. Penalty
13. Standard, Regulation or Section of the Act Violated			
	The airborne lead levels found in the breathing zones were 56.6 and 61.1 ug/m3 respectively. The employees were sampled for 470 and 409 minutes respectively with zero exposure calculated for the remainder of work shift.		
	ABATEMENT NOTE: Employees above eat and drink in and around the areas where high lead levels were found. Employer must ensure that employees do not consume food or beverage, or use tobacco products except in lunch room.		

17. Area Director  
ROBERT D. KULICK

Last Pg

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CITATION AND NOTIFICATION OF PENALTY

AREA OFFICE COPY

Total  
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Citation

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Indicate  
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## Citation and Notification of Penalty

US Department of Labor

Occupational Safety and Health Administration

2 East Blackwell Street

Dover, NJ 07801

Issuance Date 12/15/89	4. Inspection Number 107663585
5. Reporting ID 0214200	6. CSHO ID D6209
7. Optional Report No. 81	8. Page No. 46 of 61

The violation(s) described in this Citation are alleged to have occurred on or about the day the inspection was made unless otherwise indicated within the description given below.

10. Inspection Date(s):

6/22/89 - 12/13/89

11. Inspection Site:

704 Doremus Avenue  
Newark, NJ 07105

9. To:

Central Steel Drum  
and its successors  
704 Doremus Avenue  
Newark, NJ 07105

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12. Item Number	14. Description	15. Date by Which Violation Must Be Abated	16. Penalty
37 29 CFR 1910.1025(i)(3)(i):	Employees exposed to lead in excess of the permissible exposure limit (PEL), without regard to the use of respirators, were not required to shower at the end of the work shift:	01/18/90	900.00
a)	Reconditioning Plant, Central Steel Drum, Exit Area of Incinerators On 7/18/89, employee removing 55 gallon drum from conveyor belt exiting rear exit of incinerator was exposed to lead fumes over the modified reduced permissible exposure level of 44.4 ug/m3 (56.3 ug/m3 for a 9 hour shift).		
b)	Employee sampled on 10/18/89 while removing 55 gallon drums from conveyor belt at the rear of the incinerator was exposed to lead in excess of the permissible exposure limit of 50.0 ug/m3.		
The airborne lead levels found in the breathing zones were 56.6 and 51.1 ug/m3 respectively. The employees were sampled for 470 and 409			

17. Area Director

ROBERT D. KULICK

18. Last Pg

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AREA OFFICE COPY

CITATION AND NOTIFICATION OF PENALTY

OSHA-2 (Rev 1/84)

Total  
Penalty  
for This  
Citation  
Make Check  
Money Order  
Payable to:  
"DOLOSHA"  
Indicate  
Inspection  
Number  
on  
Remittance



## Citation and Notification of Penalty

U.S. Department of Labor

Occupational Safety and Health Administration

2 East Blackwell Street

Dover, NJ 07801

3. Issuance Date 12/15/89	4. Inspection Number 107663909
5. Reporting ID 0214200	6. CSHO ID D6209
7. Optional Report No. 81	8. Page No. 47 of 61

The violation(s) described in this Citation are alleged to have occurred on or about the day the inspection was made unless otherwise indicated within the description given below.

10. Inspection Date(s):

6/22/89 - 12/13/89

11. Inspection Site:

704 Doremus Avenue

Newark, NJ 07105

1. Type of Violation(s)	2. Citation Number
Serious	01

9. To:

Central Steel Drum  
and its successors  
704 Doremus Avenue  
Newark, NJ 07105

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12. Item Number	14. Description	15. Date by Which Violation Must Be Abated	16. Penalty
13. Standard, Regulation or Section of the Act Violated			
	minutes respectively with zero exposure calculated for the remainder of work shift.		
	Violation observed on or about 7/18/89.		

7. Area Director

ROBERT D. KULICK

Last Pg

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AREA OFFICE COPY

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**Citation and Notification of Penalty**  
US Department of Labor  
Occupational Safety and Health Administration  
2 East Blackwell Street  
Dover, NJ 07801

3. Issuance Date <b>12/15/89</b>	4. Inspection Number <b>107663585</b>
5. Reporting ID <b>0214200</b>	6. CSHO ID <b>D6209</b>
7. Optional Report No. <b>B1</b>	8. Page No. <b>48 of 61</b>

10. Inspection Date(s):

**6/22/89 - 12/13/89**

1. Type of Violation(s) <b>Serious</b>	2. Citation Number <b>01</b>
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11. Inspection Site:

**704 Doremus Avenue  
Newark, NJ 07105**

9. To:

**Central Steel Drum  
and its successors  
704 Doremus Avenue  
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12. Item Number	14. Description	15. Date by Which Violation Must Be Abated	16. Penalty
38 29 CFR 1910.1025(i)(3)(iii);	Employer did not ensure that employees who were exposed to lead above the PEL do not leave the work place wearing clothing or equipment contaminated by lead during the work shift:	01/18/90	900.00
a)	Reconditioning Plant, Central Steel Drum, Drum Exit Area: Employees removing 55 gallon drums from conveyor belt exiting rear of incinerator were exposed to lead fumes exceeding the modified reduced permissible exposure limit of 44.4 ug/m3 (Air sampling results indicated results of 56.3 ug/m3 for a 9 hour shift on 7/18/89).		
	Violation observed on or about 7/18/89.		
	ABATEMENT NOTE: Employer shall enforce a change of clothes (work coveralls to street clothes) and a shower for employees working in the Drum Exit Area.		

17. Area Director  
**ROBERT D. KULICK**

18. Last Pg

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CITATION AND NOTIFICATION OF PENALTY

AREA OFFICE COPY

OSHA-2 (Rev. 1/84)

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Indicate Inspection Number on Remittance

**U.S. Department of Labor**  
Occupational Safety and Health Administration



**Citation and Notification of Penalty**  
US Department of Labor  
Occupational Safety and Health Administration  
2 East Blackwell Street  
Dover, NJ 07801

3. Issuance Date 12/15/89	4. Inspection Number 107663585
5. Reporting ID 0214200	6. CSHO ID D6209
7. Optional Report No. 81	8. Page No. 49 of 51

The violation(s) described in this Citation are alleged to have occurred on or about the day the inspection was made unless otherwise indicated within the description given below.

10. Inspection Date(s):

6/22/89 - 12/13/89

1. Type of Violation(s)	2. Citation Number
Serious	01

11. Inspection Site:

704 Doremus Avenue  
Newark, NJ 07105

9. To:

Central Steel Drum  
and its successors  
704 Doremus Avenue  
Newark, NJ 07105

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12. Item Number	14. Description	15. Date by Which Violation Must Be Abated	16. Penalty
39	29 CFR 1910.1025(i)(4)(ii): Lunchroom facilities for employee(s) exposed to lead in excess of the permissible exposure limit (PEL), without regard to the use of respirators, were not provided with a temperature controlled, positive pressure and filtered air supply:	01/18/90	900.00
a)	Lunch Room, Reconditioning Plant of Central Steel Drum: On 7/18/89, employee removing 55 gallon drums from conveyor belt exiting rear of incinerator was exposed to lead fumes over the modified reduced permissible exposure limit of 44.4 ug/m3 (56.3 ug/m3 for a 9 hour sampled shift). Additionally, a wipe sample taken on bench seat of lunch room indicated 18.213 ug of inorganic lead fume and dusts.		
b)	Employee sampled on 10/18/89 while removing 55 gallon drums from conveyor belt at the rear of incinerator was exposed to lead in excess of the permissible exposure limit of 50 ug/m3 (61.1 ug/m3 based on 8 hour work shift).		

17. Area Director **ROBERT D. KULICK**

18. Last Pg

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OSHA-2 (Rev. 1/84)

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Citation and Notification of Penalty  
US Department of Labor  
Occupational Safety and Health Administration  
2 East Blackwell Street  
Dover, NJ 07801

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3. Issuance Date 12/15/89	4. Inspection Number 107663585
5. Reporting ID 0214200	6. CSHO ID D6209
7. Optional Report No. 81	8. Page No. 50 of 61

10. Inspection Date(s):

6/22/89 - 12/13/89

11. Inspection Site:

704 Doremus Avenue  
Newark, NJ 07105

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12. Item Number	14. Description	15. Date by Which Violation Must Be Abated	16. Penalty
13. Standard, Regulation or Section of the Act Violated			
	The airborne lead levels found in breathing zones were 56.6 and 61.1 ug/m3 respectively. The employees were sampled 470 and 409 minutes respectively with zero exposure calculated for remainder of work shift.  Violation observed on or about 7/18/89.		

17. Area Director

ROBERT D. KULICK

18. Last Pg

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CITATION AND NOTIFICATION OF PENALTY

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OSHA-2 (Rev. 1/84)

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Penalty  
for This  
Citation  
  
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Payable to:  
"DOL-OSHA"  
  
Indicate  
Inspection  
Number  
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Remittance

**U.S. Department of Labor**  
Occupational Safety and Health Administration



**Citation and Notification of Penalty**  
U.S. Department of Labor  
Occupational Safety and Health Administration  
2 East Blackwell Street  
Dover, NJ 07801

3. Issuance Date 12/15/89	4. Inspection Number 107663583
5. Reporting ID 0214200	6. CSHO ID D6209
7. Optional Report No. 81	8. Page No. 51 of 61

The violation(s) described in this Citation are alleged to have occurred on or about the day the inspection was made unless otherwise indicated within the description given below.

10. Inspection Date(s):

6/22/89 - 12/13/89

1. Type of Violation(s)	2. Citation Number
Serious	01

11. Inspection Site:

704 Doremus Avenue  
Newark, NJ 07105

9. To:

Central Steel Drum  
and its successors  
704 Doremus Avenue  
Newark, NJ 07105

Penalties  
Are Due  
Within 15  
Days of  
Receipt  
of This  
Notification  
Unless  
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(See  
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12. Item Number	13. Standard, Regulation or Section of the Act Violated	14. Description	15. Date by Which Violation Must Be Abated	16. Penalty
40)		29 CFR 1910.1025(i)(4)(iii): Employees exposed to lead in excess of the permissible exposure limit (PEL), without regard to the use of respirators, were not required to wash their hands and face prior to eating, drinking, smoking or applying cosmetics:	02/02/90	900.00
a)		Reconditioning Plant, Central Steel Drum, Drum Exit Area: On 7/18/89, employee removing 55 gallon drum from conveyor belt exiting rear of incinerator was exposed to lead fumes over the modified reduced permissible exposure level of 44.4 ug/m3 (56.3 ug/m3 for a 9 hour shift).		
b)		Employee sampled on 10/18/89 while removing 55 gallon drums from conveyor belt at the rear of the incinerator was exposed to lead in excess of the permissible exposure limit of 50.0 ug/m3 (61.1 ug/m3 based on 8 hour shift).		

17. Area Director  
ROBERT D. KULICK

18. Last Pg

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**U.S. Department of Labor**  
Occupational Safety and Health Administration



**Citation and Notification of Penalty**  
US Department of Labor  
Occupational Safety and Health Administration  
2 East Blackwell Street  
Dover, NJ 07801

3. Issuance Date 12/15/89	4. Inspection Number 107663585
5. Reporting ID 0214200	6. CSHO ID D6209
7. Optional Report No. 81	8. Page No. 52 of 61

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6/22/89 - 12/13/89

11. Inspection Site:

704 Doremus Avenue  
Newark, NJ 07105

1. Type of Violation(s) Serious	2. Citation Number 01
------------------------------------	--------------------------

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704 Doremus Avenue  
Newark, NJ 07105

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12. Item Number

13. Standard, Regulation or  
Section of the Act Violated

14. Description

15. Date by Which  
Violation Must  
Be Abated

16. Penalty

The airborne lead levels found in the breathing zones were 56.6 and 61.1 ug/m3 respectively. The employees were sampled for 470 and 409 minutes respectively with zero exposure calculated for the remainder of work shift.

Violation observed on or about 7/18/89.

**ABATEMENT NOTE:** Employer shall implement a hygiene program to include the ensurance of employees washing their hands and face prior to breaks and lunch.

17. Area Director

ROBERT D. KULICK

18. Last Pg

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**U.S. Department of Labor**  
Occupational Safety and Health Administration



**Citation and Notification of Penalty**  
U.S. Department of Labor  
Occupational Safety and Health Administration  
2 East Blackwell Street  
Dover, NJ 07801

3. Issuance Date 12/15/89	4. Inspection Number 107663585
5. Reporting ID 0214200	6. CSHO ID D6209
7. Optional Report No. 81	8. Page No. 53 of 61

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10. Inspection Date(s):

6/22/89 - 12/13/89

11. Inspection Site:

704 Doremus Avenue  
Newark, NJ 07105

1. Type of Violation(s)	2. Citation Number
Serious	01

9. To:

Central Steel Drum  
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704 Doremus Avenue  
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12. Item Number	13. Standard, Regulation or Section of the Act Violated	14. Description	15. Date by Which Violation Must Be Abated	16. Penalty
41	29 CFR 1910.1025(i)(4)(iv):	Employees entering lunchroom facilities with protective work clothing or equipment were not required to remove surface lead dust by vacuuming, downdraft booth, or other cleaning methods:	02/02/90	800.00
a)		Reconditioning Plant, Central Steel Drum, Drum Exit Area: On 7/18/89, employee removing 55 gallon drums from conveyor belt exiting rear of incinerator was exposed to lead fumes exceeding the modified reduced permissible exposure level of 44.4 ug/m3 (56.3 ug/m3 for a 9 hour shift).		
b)		Employee sampled on 10/18/89 while removing 55 gallon drums from conveyor belt at the rear of incinerator was exposed to lead in excess of the permissible exposure limit of 50.0 ug/m3 (61.1 ug/m3 based on 8 hour shift).		

17. Area Director **ROBERT D. KULICK**

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3. Issuance Date 12/15/89	4. Inspection Number 107663585
5. Reporting ID 0214200	6. CSHO ID D6209
7. Optional Report No. 81	8. Page No. 54 of 61

10. Inspection Date(s):

6/22/89 - 12/13/89

11. Inspection Site:

704 Doremus Avenue  
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12. Item Number	13. Standard, Regulation or Section of the Act Violated	14. Description	15. Date by Which Violation Must Be Abated	16. Penalty
		The airborne lead levels found in the breathing zones were 56.6 and 61.6 $\mu\text{g}/\text{m}^3$ respectively. The employees were sampled for 470 and 409 minutes respectively with zero exposure calculated for the remainder of work shift.		
		Violation observed on or about 7/18/89.		
		ABATEMENT NOTE: Employer must ensure that employees working in Top Deck Area, Drum Exit Area must remove surface lead dust from work clothes before entering lunch room.		

17. Area Director  
ROBERT D. KULICK

18. Last Pg

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U.S. Department of Labor  
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2 East Blackwell Street  
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3. Issuance Date 12/13/89	4. Inspection Number 107663585
5. Reporting ID 0214200	6. CSHO ID D6209
7. Optional Report No. 81	8. Page No. 55 of 61

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6/22/89 - 12/13/89

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704 Doremus Avenue  
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12. Item Number	13. Standard, Regulation or Section of the Act Violated	14. Description	15. Date by Which Violation Must Be Abated	16. Penalty
42	29 CFR 1910.1025(j)(3)(i)(b):	The employer did not make available medical examinations and consultations to each employee prior to assignment for each employee being assigned for the first time to an area in which airborne concentrations of lead are at or above the action level:	02/02/90	800.00
a)		Employee sampled on 7/18/89 removing 55 gallon drums from conveyor belt exiting rear of incinerator was exposed to lead fumes in excess of the modified reduced permissible exposure limit of 44.4 ug/m3 (56 ug/m3 for a 9 hour shift).		
		Employee sampled on 10/18/89 removing 55 gallon drums from conveyor belt exiting rear of incinerator was exposed to lead fumes in excess of the permissible exposure limit of 50.0 ug/m3 (61.1 ug/m3 for an 8 hour work shift).		
b)		Employee sampled on 7/18/89 while operating abrasive blasting unit was exposed to lead fumes in excess of the action level of 30.0 ug/m3 (44.4		

17. Area Director ROBERT D. KULICK

Last Pg

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**U.S. Department of Labor**  
Occupational Safety and Health Administration

**Citation and Notification of Penalty**  
US Department of Labor  
Occupational Safety and Health Administration  
2 East Blackwell Street  
Dover, NJ 07801

3. Issuance Date <b>12/15/89</b>	4. Inspection Number <b>107663585</b>
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7. Optional Report No. <b>81</b>	8. Page No. <b>56 of 61</b>

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10. Inspection Date(s):

**6/22/89 - 12/13/89**

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Section of the Act Violated

14. Description

15. Date by Which  
Violation Must  
Be Abated

16. Penalty

ug/m3 for a 9 hour shift).

The airborne lead levels found in breathing zone were 44.4, 56.6 and 61.6 ug/m3 respectively. The employees were sampled for 476, 470 and 409 minutes respectively with zero exposure calculated for remainder of work shift.

Violation observed on or about 7/18/89.

43

29 CFR 1910.1025(1)(1)(i): Employee(s) working in an area where there is potential exposure to airborne lead at any level were not informed of the content of Appendices A and B of this regulation:

a)

Reconditioning Plant, Drum Exit Area (Incinerator) and Steel Shot Area: Employees removing 55 gallon drums from conveyor belt exiting the incinerator and working in steel shot area are exposed to airborne lead.

Violation observed on or about 7/18/89.

01/03/90

900.00

17. Area Director

**ROBERT D. KULICK**

18. Last Pg

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7. Optional Report No. 81	8. Page No. 37 of 61

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6/22/89 - 12/13/89

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12. Item Number	14. Description	15. Date by Which Violation Must Be Abated	16. Penalty
44 29 CFR 1910.1025(1)(2)(i); a) Violation observed on or about 6/22/89.	A copy of 29 CFR 1910.1025 and its appendices was not made readily available to all employees who had a potential exposure to airborne lead at any level:  Throughout the plant of Central Steel Drum, Newark, NJ: Employees removing 55 gallon drums from conveyor belt exiting rear of incinerator, and abrasive blasting area are exposed to lead fumes.	01/03/90	900.00

17. Area Director  
ROBERT D. KULICK

Last Pg

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AREA OFFICE COPY

CITATION AND NOTIFICATION OF PENALTY

OSHA-2 (Rev. 1/84)

Total  
Penalty  
for This  
Citation  
Make Check or  
Money Order  
Payable to:  
DOL-OSHA  
Indicate  
Inspection  
Number  
on  
Remittance

**U.S. Department of Labor**  
Occupational Safety and Health Administration



**Citation and Notification of Penalty**  
U.S. Department of Labor  
Occupational Safety and Health Administration  
2 East Blackwell Street  
Dover, NJ 07801

The violation(s) described in this Citation are alleged to have occurred on or about the day the inspection was made unless otherwise indicated within the description given below.

3. Issuance Date <b>12/15/89</b>	4. Inspection Number <b>107663585</b>
5. Reporting ID <b>0214200</b>	6. CSHO ID <b>D6209</b>
7. Optional Report No. <b>81</b>	8. Page No. <b>58 of 61</b>

10. Inspection Date(s):

**6/22/89 - 12/13/89**

11. Inspection Site:

**704 Doremus Avenue  
Newark, NJ 07105**

Type of Violation(s)	Citation Number
Serious	01

9. To:

**Central Steel Drum  
and its successors  
704 Doremus Avenue  
Newark, NJ 07105**

Penalties  
Are Due  
Within 15  
Days of  
Receipt  
of This  
Notification  
Unless  
Contested  
(See  
enclosed  
Booklet)

This Section  
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Before  
Posting

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12. Item Number	14. Description	15. Date by Which Violation Must Be Abated	16. Penalty
45	29 CFR 1910.1200(e)(1)(i): The written hazard communication program did not include a complete list of the hazardous chemicals known to be present using an identity that is referenced on the appropriate material safety data sheet (the list may be compiled for the workplace as a whole or for individual work areas):  a) Office of Central Steel Drum, Inc., Newark, NJ: Employees were working with degreasers, paints and solvents (SB-45 Black Drum Enamel, White Low Voc High Heat Paint, or Low Voc Drum Enamel) in various operations of the plant. (Spray operations, drum handling and maintenance).	01/03/90	\$800.00

Violation observed on or about 6/22/89.

17. Area Director  
**ROBERT D. KULICK**

18. Last Pg

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**Citation and Notification of Penalty**  
U.S. Department of Labor  
Occupational Safety and Health Administration  
2 East Blackwell Street  
Dover, NJ 07801

3. Issuance Date 12/15/89	4. Inspection Number 107663585
5. Reporting ID 0214200	6. CSHO ID D6209
7. Optional Report No. 81	8. Page No. 59 of 61

The violation(s) described in this Citation are alleged to have occurred on or about the day the inspection was made unless otherwise indicated within the description given below.

10. Inspection Date(s):

6/22/89 - 12/13/89

11. Inspection Site:

704 Doremus Avenue  
Newark, NJ 07105

Type of Violation(s)	2. Citation Number
Serious	01

9. To:

Central Steel Drum  
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704 Doremus Avenue  
Newark, NJ 07105

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12. Item Number	13. Standard, Regulation or Section of the Act Violated	14. Description	15. Date by Which Violation Must Be Abated	16. Penalty
46 29 CFR 1910.1200(e)(1)(ii):		The written hazard communication program did not include the methods that will be used to inform employees of the hazards of nonroutine tasks, (for example, the cleaning of reactor vessels), and the hazards associated with chemicals contained in unlabeled pipes in their work areas:	01/03/90	400.00
29		Office of Central Steel Drum, Inc., Newark, NJ: Employees clean and maintain unlabeled pipes every working day, which contain paints (SB-45 Black Drum Enamel or White Low Voc High Heat Paint).		
		Violation observed on or about 6/22/89.		

17. Area Director  
ROBERT D. KULICK

Last Pg

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Payable to:  
"DOL-OSHA"  
Indicate  
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Number  
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Remittance

**U.S. Department of Labor**  
Occupational Safety and Health Administration



**Citation and Notification of Penalty**  
U.S. Department of Labor  
Occupational Safety and Health Administration  
2 East Blackwell Street  
Dover, NJ 07801

3. Issuance Date 12/15/89	4. Inspection Number 107663583
5. Reporting ID 0214200	6. CSHO ID D6209
7. Optional Report No. 81	8. Page No. 60 of 61

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10. Inspection Date(s):

6/22/89 - 12/13/89

11. Inspection Site:

704 Doremus Avenue  
Newark, NJ 07105

9. To:

Central Steel Drum  
and its successors  
704 Doremus Avenue  
Newark, NJ 07105

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12. Item Number	14. Description	15. Date by Which Violation Must Be Abated	16. Penalty
47 29 CFR 1910.1200(f)(5)(ii):	The employer did not ensure that each container of hazardous chemicals in the workplace is labeled, tagged or marked specifying the appropriate hazard warning and identity of the hazardous chemicals contained therein:  at: Workyard of Central Steel Drum Co.: 55 gallon drums entering yard and being prepared for incinerator were not labeled, tagged or marked with appropriate hazard warnings or identity. These drums contain as much as 3/4 of 1 gallon of hazardous materials and are therefore a potential hazard to employees who handle them.  Violation observed on or about 11/30/89.	02/02/90	700.00

17. Area Director  
ROBERT D. KULICK

18. Last Pg

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Total  
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U.S. Department of Labor  
Occupational Safety and Health Administration



Citation and Notification of Penalty  
U.S. Department of Labor  
Occupational Safety and Health Administration  
2 East Blackwell Street  
Dover, NJ 07801

3. Issuance Date 12/15/89	4. Inspection Number 107663585
5. Reporting ID 0214200	6. CSHO ID D6209
7. Optional Report No. 81	8. Page No. 61 of 61

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10. Inspection Date(s):

6/22/89 - 12/13/89

11. Inspection Site:

704 Doremus Avenue  
Newark, NJ 07105

1. Type of Violation(s)	2. Citation Number
Serious	01

9. To:

Central Steel Drum  
and its successors  
704 Doremus Avenue  
Newark, NJ 07105

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12. Item Number	13. Standard, Regulation or Section of the Act Violated	14. Description	15. Date by Which Violation Must Be Abated	16. Penalty
4B	29 CFR 1910.1200(g)(1):	Employer did not have a material safety data sheet for each hazardous chemical which is used in the workplace:	01/08/90	700.00
a)		Office of Central Steel Drum, Newark, NJ: Company did not have a material safety data sheet (MSDS) for 6B 4888 Brown Liner, which was used in the inner lining department.		
b)		Company did not have material safety data sheets available for the materials which are found at the bottom of the incoming drums prior to burning, such as but not limited to: intermediates, organic solvents, pigments, etc.		
		Violation observed on or about 10/25/89.		

17. Area Director  
ROBERT D. FULICK

95700.00

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AREA OFFICE COPY

CITATION AND NOTIFICATION OF PENALTY

OSHA-2 (Rev. 1/84)

Penalties Are Due Within 15 Days of Receipt of This Notification Unless Contested (See enclosed Booklet)

This Section May Be Detached Before Posting

Total Penalty for This Citation  
Make Check or Money Order Payable to: "DOL-OSHA"  
Indicate Inspection Number on Remittance





**Citation and Notification of Penalty**

U.S. Department of Labor  
Occupational Safety and Health Administration  
2 East Blackwell Street  
Riverside, NJ 07081

3. Issuance Date 12/15/89	4. Inspection Number 107663585
5. Reporting ID 0214200	6. CSHO ID D6209
7. Optional Report No. 81	8. Page No. 1 of 8

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10. Inspection Date(s):  
6/22/89 - 12/13/89

1. Type of Violation(s)	2. Citation Number
Willful	02

11. Inspection Site:  
704 Doreaus Avenue  
Newark, NJ 07105

9. To:  
Central Steel Drum  
and its successors  
704 Doreaus Avenue  
Newark, NJ 07105

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12. Item Number	13. Standard, Regulation or Section of the Act Violated	14. Description	15. Date by Which Violation Must Be Abated	16. Penalty
1	29 CFR 1910.219(f)(3):	Sprocket wheels and chains which were seven feet or less above floors or platforms were not enclosed:  Unguarded chain and sprockets were located on the following machines and locations:  a) General Assembly Area, Main Drive Conveyor Belt to Rollers in Docking Area;  b) General Assembly Area, Main Drive of Conveyor Belt for lead of Drums to Blue Area;  c) Chain and Sprocket improperly guarded for conveyor belt leading from inner lining area oven to main spray booth, deteriorated guard leads to exposure of nip points;  d) Outer head Spray Booth, guard was inadequate because deteriorated guard enabled employees to come into contact with nip points.	01/03/90	\$8000.00

17. Area Director ROBERT D. KULICK

182st Pg

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CREATION AND NOTIFICATION OF PENALTY

OSHA-2 (Rev. 1/84)

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This Section May Be Detached Before Posting

Total Penalty for This Citation  
Make Check or Money Order Payable to: "DOL-OSHA"  
Indicate Inspection Number on Remittance



Citation and Notification of Penalty

U.S. Department of Labor  
Occupational Safety and Health Administration  
2 East Blackwell Street  
Bever, NJ 07801

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3. Issuance Date 12/15/89	4. Inspection Number 107663585
5. Reporting ID 0214200	6. CSHO ID D6209
7. Optional Report No. 81	8. Page No. 2 of 8

10. Inspection Date(s):

6/22/89 - 12/13/89

Type of Violation(s)	2. Citation Number
Willful	02

11. Inspection Site:

704 Doremus Avenue  
Newark, NJ 07105

8. To:

Central Steel Drum  
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704 Doremus Avenue  
Newark, NJ 07105

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12. Item Number

13. Standard, Regulation or  
Section of the Act Violated

14. Description

15. Date by Which  
Violation Must  
Be Abated

16. Penalty

e) Top Deck Area; chain and sprocket are improperly guarded, main drive of cabinet blaster (b);

f) General Assembly Area; motor powering conveyor system (rear of oven to general assembly area) has improperly guarded chain and sprocket;

g) General Assembly Area; motor powering conveyor system (rear oven for lids traveling to glueing area has improperly guarded chain and sprocket (above conveyor system));

h) General Assembly Area, motor powering conveyor system exiting rear of oven to glueing area has improperly guarded chain and sprocket (beneath conveyor system).

Violation observed on or about 10/18/89

17. Area Director ROBERT D. KULICK

Let Pg

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## Citation and Notification of Penalty

U.S. Department of Labor  
Occupational Safety and Health Administration  
2 East Blackwell Street  
Dover, NJ 07801

3. Issuance Date 12/15/89	4. Inspection Number 107663585
5. Reporting ID 0214200	6. CSHQ ID D6209
7. Optional Report No. 81	8. Page No. 3 of 8

The violation(s) described in this Citation are alleged to have occurred on or about the day the inspection was made unless otherwise indicated within the description given below.

10. Inspection Date(s):

6/22/89 - 12/13/89

1. Type of Violation(s)	2. Citation Number
Willful	02

11. Inspection Site:

704 Doreaus Avenue  
Newark, NJ 07105

9. To:

Central Steel Drum  
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704 Doreaus Avenue  
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12. Item Number	14. Description	15. Date by Which Violation Must Be Abated	16. Penalty
2	29 CFR 1910.1025(j)(2)(i): The employer did not make available biological monitoring in the form of blood sampling and analysis for lead and zinc protoporphyrin levels to each employee who may be exposed above the action level for more than 30 days per year:	01/18/90	\$8000.00
	Reconditioning Plant, Central Steel Drum, Drum Exit Area (Incinerator) and Steel Shot Area:		
	a) Employees sampled on 7/18/89 while removing 55 gallon drums from conveyor belt at the rear of the incinerator and while operating the abrasive blasting unit were exposed to lead in excess of the modified permissible exposure limit of 44.4 ug/m <sup>3</sup> (micrograms per cubic meter) based upon a 9 hour workshift and above the action limit of 30 ug/m <sup>3</sup> , respectively.		
	The airborne lead levels found in the breathing zones were 56 ug/m <sup>3</sup> and 43 ug/m <sup>3</sup> , respectively. They were sampled for 470 minutes and 476 minutes, respectively, with zero exposure calculated for the remainder of the work shift.		

17. Area Director ROBERT D. KULICK

18. Post Pg

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Total  
Penalty  
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Citation  
Make Check or  
Money Order  
Payable to:  
"DOL-OSHA"  
Indicate  
Inspection  
Number  
on  
Remittance

**EMPLOYER RIGHTS AND RESPONSIBILITIES** — The enclosed booklet outlines employer rights and responsibilities and should be read in conjunction with this notification.

AREA OFFICE COPY

CITATION AND NOTIFICATION OF PENALTY

OSHA-2 (Rev. 1/84)





Citation and Notification of Penalty

U.S. Department of Labor  
Occupational Safety and Health Administration  
2 East Blackwell Street  
Dover, NJ 07801

The violation(s) described in this Citation are alleged to have occurred on or about the day the inspection was made unless otherwise indicated within the description given below.

3. Issuance Date 12/15/89	4. Inspection Number 107663585
5. Reporting ID 0214200	6. CSHO ID D6209
7. Optional Report No. 81	8. Page No. 4 of 8

10. Inspection Date(s):

6/22/89 - 12/13/89

11. Inspection Site:

704 Doremus Avenue  
Newark, NJ 07105

1. Type of Violation(s)	2. Citation Number
Willful	02

9. To:

Central Steel Drum  
and its successors  
704 Doremus Avenue  
Newark, NJ 07105

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This Citation describes violations of the Occupational Safety and Health Act of 1970. The penalty(ies) listed below are based on these violations. You must abate the violations referred to in this Citation by the dates listed below and pay the penalties proposed, unless within 15 working days (excluding weekends and Federal holidays) from your receipt of this Citation and penalty you mail a notice of contest to the U.S. Department of Labor Area Office at the address shown above. (See the enclosed booklet which outlines your rights and responsibilities and should be read in conjunction with this form.) You are further notified that unless you inform the Area Director in writing that you intend to contest the Citation or proposed penalties within 15 working days after receipt, this Citation and the proposed penalties will become a final order of the Occupational Safety and Health Review Commission and may not be reviewed by any court or agency. Issuance of this Citation does not constitute a finding that a violation of the Act has occurred unless there is a failure to contest as provided for in the Act or, if contested, unless the Citation is affirmed by the Review Commission.

12. Item Number	13. Standard, Regulation or Section of the Act Violated	14. Description	15. Date by Which Violation Must Be Abated	16. Penalty
b)		Employee sampled on 10/18/89 while removing 55 gallon drum from conveyor belt at the rear of incenerator was exposed to lead in excess of the permissible exposure limit of 50 ug/m3.  The airborne lead level found in breathing zone was 61 ug/m3. The employee was sampled for 409 minutes respectively with zero exposure calculated for the remainder of work the shift.  Violation observed on or about 7/18/89		

17. Area Director ROBERT D. KULICK

Last Pg

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**U.S. Department of Labor**  
Occupational Safety and Health Administration



**Citation and Notification of Penalty**

U.S. Department of Labor  
Occupational Safety and Health Administration  
2 East Blackwell Street  
Dover, NJ 07801

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3. Issuance Date 12/15/89	4. Inspection Number 107663585
5. Reporting ID 0214200	6. CSHQ ID D6209
7. Optional Report No. 81	8. Page No. 5 of 8

10. Inspection Date(s):

6/22/89 - 12/13/89

11. Inspection Site:

704 Doremus Avenue  
Newark, NJ 07105

1. Type of Violation(s)	2. Citation Number
Willful	02

9. To:  
Central Steel Drum  
and its successors  
704 Doremus Avenue  
Newark, NJ 07105

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12. Item Number	13. Standard, Regulation or Section of the Act Violated	14. Description	15. Date by Which Violation Must Be Abated	16. Penalty
3	29 CFR 1910.1025(1)(1)(ii):	A training program was not instituted and required for all employees who were subject to lead exposure at or above the action level, or for whom possibility of skin or eye irritation existed:	01/18/90	\$000.00
a)		Reconditioning Plant, Drum Exit Area (Incinerator) and Steel Shot Area: Employees removing 55 gallon drums from conveyor belt exiting rear of incinerator and operating abrasive blasting unit operators were exposed to lead fumes over the action level of 30 ug/m3 (56 ug/m3 and 43 ug/m3 for a 9 hour. shift on 7/18/89.		
b)		Employee sampled on 10/18/89, while removing 55 gallon drums from conveyor belt of the rear incinerator was sampled to lead in excess of the permissible exposure limit of 50 ug/m3 (61.1 ug/m3 based on an 8 hour work shift.		

17. Area Director ROBERT D. KULICK

West Pg

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**Citation and Notification of Penalty**

U.S. Department of Labor  
Occupational Safety and Health Administration  
2 East Blackwell Street  
Dover, NJ 07801

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5. Reporting ID 0214200	6. CSHO ID D6209
7. Optional Report No. 81	8. Page No. 6 of 8

10. Inspection Date(s):

6/22/89 - 12/13/89

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704 Doremus Avenue  
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1. Type of Violation(s)	2. Citation Number
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12. Item Number	14. Description	15. Date by Which Violation Must Be Abated	16. Penalty
13. Standard, Regulation or Section of the Act Violated			
	The airborne lead levels, in the employees breathing zones were 43, 56.6 and 61.1 ug/m3 respectively. The employees were sampled for 476, 470 and 409 minutes respectively with zero exposure calculated for remainder of work shift.		
<b>ABATEMENT NOTE:</b>			
A) The employer shall provide initial training prior to the time of initial job assignment for those employees who are subject to exposure to lead at or above the action level or for whom the possibility of skin or eye irritation exists;			
B) Training program shall be repeated at least annually for each employee;			
C) The employer shall assure that each employee is informed of the following:			
1. The content of this standard (1910.1025) and its appendices.			
2. Purpose, proper selection, fitting, use and limitations of			

17. Area Director ROBERT D. KULICK

Last Pg

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Citation and Notification of Penalty  
U.S. Department of Labor

Occupational Safety and Health Administration  
2 East Blackwell Street  
Dover, NJ 07801

3. Issue Date 12/15/89	4. Inspection Number 107663583
5. Reporting ID 0214200	6. CSHO ID D6209
7. Optional Report No. 81	8. Page No. 7 of 8

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10. Inspection Date(s):

6/22/89 - 12/13/89

11. Inspection Site:

704 Doremus Avenue  
Newark, NJ 07105

1. Type of Violation(s)	2. Citation Number
Willful	02

9. To:

Central Steel Drum  
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12. Item Number	14. Description	15. Date by Which Violation Must Be Abated	16. Penalty
13. Standard, Regulation or Section of the Act Violated	respirators. 3. Specific nature of the operations which could result in exposure to lead above the action level. 4. Purpose and description of the medical surveillance program and the medical removal protection program including information concerning the adverse health effects associated with excessive exposure to lead. 5. Engineering controls and work practices associated with the employees job assignment. 6. Contents of any compliance plan in effect. 7. Instructions to employees that chelating agents would not routinely be used to remove lead from their bodies and should not be used at all except under the direction of a licensed physician.		

Violation observed on or about 7/18/89

17. Area Director ROBERT D. KULICK

Last Pg

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OSHA-2 (Rev. 1/84)

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Citation and Notification of Penalty  
U.S. Department of Labor

Occupational Safety and Health Administration  
2 East Blackwell Street  
Dover, NJ 07801

3. Issue Date 12/15/89	4. Inspection Number 107663585
5. Reporting ID 0214200	6. CSHO ID D6209
7. Optional Report No. 81	8. Page No. 8 of 8

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6/22/89 - 12/13/89

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704 Doremus Avenue  
Newark, NJ 07105

1. Type of Violation(s)	2. Citation Number
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9. To:

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12. Item Number	14. Description	15. Date by Which Violation Must Be Abated	16. Penalty
4	29 CFR 1910.1025(d)(6)(ii): Where the initial determination or subsequent monitoring revealed employee exposure to lead to be at or above the action level but below the permissible exposure limit; monitoring was not repeated at least every six (6) months and continued at the required frequency until at least two consecutive measurements, taken at least seven (7) days apart, were below the action level:	01/18/90	\$600.00
a)	Reconditioning floor, Central Steel Drum, Drum Exit Area (Incinerator) and Steel Shot Area: Employer upon initial determination revealing lead to be at or above the action level, on 8/1/85, (0.041 ug/m3 or 41 ug/m3) did not monitor every six (6) months and a continued frequency until at least two consecutive measurements taken at least seven (7) days apart were below the action level.  If employer had followed the correct air monitoring procedures outlined in 1910.1025(d)(1) through 1910.1025(d)(9) corrective procedures could have been in place as early as 1986. Violation observed on or about 7/18/89		

17. Area Director ROBERT D. KULICK

18. \$320.00

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Citation and Notification of Penalty

Occupational Safety and Health Administration  
2 East Blackwell Street  
Lever, NJ 07801

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3. Issuance Date 12/15/89	4. Inspection Number 107663585
5. Reporting ID 0214200	6. CSHQ ID DSE09
7. Optional Report No. B1	8. Page No. 1 of 4

10. Inspection Date(s):

6/22/89 - 12/13/89

11. Inspection Site:

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12. Item Number	13. Standard, Regulation or Section of the Act Violated	14. Description	15. Date by Which Violation Must Be Abated	16. Penalty
1	29 CFR 1903.2(a)(1):	The OSHA notice was not posted to inform employees of the protections and obligations provided for in the Act:  OSHA notice was not posted in plant of Central Steel Drum.  Violation observed on or about 6/22/89	12/19/89	100.00
2	29 CFR 1910.20(g)(2):	A copy of 29 CFR 1910.20 and its appendices was not made readily available to employees:  Office of Central Steel Drum  Violation observed on or about 6/22/89	Immediately Upon Receipt	0.00

17. Area Director ROBERT D. KULICK

Last Pg

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**U.S. Department of Labor**  
Occupational Safety and Health Administration



**Citation and Notification of Penalty**

U.S. Department of Labor  
Occupational Safety and Health Administration  
2 East Blackwell Street  
Dover, NJ 07801

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Type of Violation(s)	2. Citation Number
Other	03

9. To:  
Central Steel Drum  
and its successors  
704 Doremus Avenue  
Newark, NJ 07105

11. Inspection Site:  
704 Doremus Avenue  
Newark, NJ 07105

3. Issuance Date 12/15/89	4. Inspection Number 107663585
5. Reporting ID 0214200	6. CSHO ID D6209
7. Optional Report No. B1	8. Page No. 2 of 4

10. Inspection Date(s):  
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12. Item Number	14. Description	15. Date by Which Violation Must Be Abated	16. Penalty
3	29 CFR 1910.134(b)(5): Respirators were not regularly cleaned and disinfected:	01/03/90	0.00
3	Head Spray Booth. Central Steel Drums: Employees wearing American Optical half face respirators with TC-23C-435 filters were spray painting heads of 55 gallon drums.  Violation observed on or about 10/28/89		
4	29 CFR 1910.141(g)(2): Employees were permitted to consume food or beverage in area(s) exposed to toxic materials:  Employees exposed to lead fumes were consuming food and beverage in the immediate area.  Violation observed on or about 7/18/89	12/26/89	300.00

17. Area Director ROBERT D. KULICK

Last Pg

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OSHA-2 (Rev 1/84)

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**Citation and Notification of Penalty**  
U.S. Department of Labor

Occupational Safety and Health Administration  
2 East Blackwell Street  
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3. Date 12/13/89	4. Inspection Number 107653585
5. Reporting ID 0214200	6. CSHO ID D6209
7. Optional Report No. 81	8. Page No. 3 of 4

The violation(s) described in this Citation are alleged to have occurred on or about the day the inspection was made unless otherwise indicated within the description given below.

10. Inspection Date(s):

6/22/89 - 12/13/89

1. Type of Violation(s)	2. Citation Number
Other	03

11. Inspection Site:

704 Doremus Avenue  
Newark, NJ 07105

9. To:

Central Steel Drum  
and its successors  
704 Doremus Avenue  
Newark, NJ 07105

THE LAW REQUIRES that a copy of this Citation be posted immediately in a prominent place at or near the location of the violation(s) cited below. The Citation must remain posted until the violations cited below have been abated, or for 3 working days (excluding weekends and Federal holidays), whichever is longer.

This Citation describes violations of the Occupational Safety and Health Act of 1970. The penalty(ies) listed below are based on these violations. You must abate the violations referred to in this Citation by the dates listed below and pay the penalties proposed, unless within 15 working days (excluding weekends and Federal holidays) from your receipt of this Citation and penalty you mail a notice of contest to the U.S. Department of Labor Area Office at the address shown above. (See the enclosed booklet which outlines your rights and responsibilities and should be read in conjunction with this form.) You are further notified that unless you inform the Area Director in writing that you intend to contest the Citation or proposed penalties within 15 working days after receipt, this Citation and the proposed penalties will become a final order of the Occupational Safety and Health Review Commission and may not be reviewed by any court or agency. Issuance of this Citation does not constitute a finding that a violation of the Act has occurred unless there is a failure to contest as provided for in the Act or, if contested, unless the Citation is affirmed by the Review Commission.

12. Item Number	14. Description	15. Date by Which Violation Must Be Abated	16. Penalty
13. Standard, Regulation or Section of the Act Violated			
29 CFR 1910.151(c):	Employees were exposed to injurious materials and suitable facilities for quick drenching or flushing of the eyes and body were not provided within the work area for immediate use:  a. Inner Lining Spray Booth Area b. Main Spray Booth Area c. Inner Storage Area  Employees are exposed to possible solvent splash while spray painting and transporting paints.  Violation observed on or about 10/18/89	01/18/90	0.00

17. Area Director  
ROBERT D. KULICK

Last Pg

**NOTICE TO EMPLOYEES** — The law gives an employee or his representative the opportunity to object to any abatement date set for a violation if he believes the date to be unreasonable. The contest must be mailed to the U.S. Department of Labor Area Office at the address shown above within 15 working days (excluding weekends and Federal holidays) of the receipt by the employer of this Citation and penalty.

**EMPLOYER DISCRIMINATION UNLAWFUL** — The law prohibits discrimination by an employer against an employee for filing a complaint or for exercising any rights under this Act. An employee who believes that he has been discriminated against may file a complaint no later than 30 days after the discrimination with the U.S. Department of Labor Area Office at the address shown above.

**EMPLOYER RIGHTS AND RESPONSIBILITIES** — The enclosed booklet outlines employer rights and responsibilities and should be read in conjunction with this notification.

AREA OFFICE COPY

CITATION AND NOTIFICATION OF PENALTY

OSHA-2 (Rev. 1/84)

Penalties Are Due Within 15 Days of Receipt of This Notification Unless Contested (See enclosed Booklet)

This Section May Be Detached Before Posting

Total Penalty for This Citation

Make Check or Money Order Payable to: "DOL-OSHA"

Indicate Inspection Number on Remittance

Citation and Notification of Penalty

U.S. Department of Labor  
Occupational Safety and Health Administration  
2 East Blackwell Street  
Trenton, NJ 07801

The violation(s) described in this Citation are alleged to have occurred on or about the day the inspection was made unless otherwise indicated within the description given below.

3. Issuance Date 12/15/89	4. Inspection Number 107663525
5. Reporting ID 0214200	6. CSHO ID D6209
7. Optional Report No. 81	8. Page No. 4 of 4

10. Inspection Date(s):

6/22/89 - 12/13/89

11. Inspection Site:

704 Forenus Avenue  
Newark, NJ 07105

1. Type of Violation(s)	2. Citation Number
Other	03

9. To:

Central Steel Drum  
and its successors  
704 Forenus Avenue  
Newark, NJ 07105

THE LAW REQUIRES that a copy of this Citation be posted immediately in a prominent place at or near the location of the violation(s) cited below. The Citation must remain posted until the violations cited below have been abated, or for 3 working days (excluding weekends and Federal holidays), whichever is longer.

This Citation describes violations of the Occupational Safety and Health Act of 1970. The penalty(ies) listed below are based on these violations. You must abate the violations referred to in this Citation by the dates listed below and pay the penalties proposed, unless within 15 working days (excluding weekends and Federal holidays) from your receipt of this Citation and penalty you mail a notice of contest to the U.S. Department of Labor Area Office at the address shown above. (See the enclosed booklet which outlines your rights and responsibilities and should be read in conjunction with this form.) You are further notified that unless you inform the Area Director in writing that you intend to contest the Citation or proposed penalties within 15 working days after receipt, this Citation and the proposed penalties will become a final order of the Occupational Safety and Health Review Commission and may not be reviewed by any court or agency. Issuance of this Citation does not constitute a finding that a violation of the Act has occurred unless there is a failure to contest as provided for in the Act or, if contested, unless the Citation is affirmed by the Review Commission.

12. Item Number	14. Description	15. Date by Which Violation Must Be Abated	16. Penalty
13. Standard, Regulation or Section of the Act Violated			
29 CFR 1910.1025(m)(2)(1);	Warning signs bearing the legend: "WARNING. LEAD WORK AREA. POISON, NO SMOKING OR EATING", were not posted in each work area where the permissible exposure limit (PEL) was exceeded:	01/03/90	0.00
	Reconditioning Plant, Central Steel Drum, Drum Exit Areas Employees removing 55 gallon drums from conveyor belt exiting rear of incinerator were exposed to lead fumes over the modified reduced permissible exposure limit of 44.4 ug/m3 (56.3 ug/m3 for a 9 hour shift on 7/18/89).		
	STATEMENT NOTE: Employer shall place and maintain lead signs specified in 1910.1025(m)(2)(1).		

17. Area Director  
ROBERT D. MULICK

18. \$ 400.00

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AREA OFFICE COPY

CITATION AND NOTIFICATION OF PENALTY

OSHA-2 (Rev 1/84)

Total  
Penalty  
for This  
Citation  
Make Check or  
Money Order  
Payable to:  
"DOL-OSHA"  
Indicate  
Inspection  
Number  
on  
Remittance

Penalties  
Are Due  
Within 15  
Days of  
Receipt  
of This  
Notification  
Unless  
Contested  
(See  
enclosed  
Booklet)

This Section  
May Be  
Detached  
Before  
Posting